

FES 97-8
w/Record of
Decision 4/28/97

Box 30



Abbreviated Final General Management Plan Environmental Impact Statement

Independence National Historical Park
Pennsylvania

INDEPENDENCE
NATIONAL
HISTORICAL PARK

ON MICROFILM



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NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

D18(INDE)

MAR 21 1997


Dear Friend:

I am delighted to report to you that the General Management Plan for Independence National Historical Park is now available. In this letter, I will summarize for you the key decisions comprised by the plan. (You certainly are welcome to read the entire 398 page *Final General Management Plan / Environmental Impact Statement*. Copies are available for review at the Free Library of Philadelphia, the Philadelphia City Planning Commission, the State Library of Pennsylvania in Harrisburg. Personal copies of the plan are available at park headquarters.) The plan becomes final in approximately 30 days.

The National Park Service soon will select a design team to prepare a master site plan and urban design guidelines for redevelopment of Independence Mall in accordance with the GMP. In cooperation with partners, architectural design for a new Gateway Visitor Center and a renovated underground parking garage on the second block of the mall will be initiated shortly thereafter. I anticipate that this activity also will be the catalyst for the development of two important new initiatives for the mall: the Independence Park Institute and the National Constitution Center. And the City of Philadelphia and many private organizations continue to make progress in the enhancement of the historic area. In the coming years, visitors and residents will see remarkable changes in the park.

I thank you for your attention and contributions to the planning process over the last several years. Please stay tuned as we move through implementation of our shared vision.

Sincerely,


Martha B. Aikens
Superintendent

Enclosure



SUMMARY OF ACTIONS

FINAL GENERAL MANAGEMENT PLAN, INDEPENDENCE NATIONAL HISTORICAL PARK

The National Park Service has prepared a *Final General Management Plan / Environmental Impact Statement* (GMP) to guide management of Independence National Historical Park (INHP) over the next 10-15 years. It builds on the August 1995 *Draft General Management Plan / Environmental Impact Statement*, and includes the results of extensive public review and comments. This product of over three years of research, public participation, and planning comprises the results of the first large-scale reconsideration of the park's role, resources, and operations in over 20 years.

The plan presents a new *VISION* for the park in the twenty-first century. The vision begins with preserving and interpreting the past, the mission articulated by Congress in the park's founding legislation. It also reaches beyond. For we have learned that the public believes that the park can become a more vital anchor institution, offering visitors an even more memorable and inspirational experience. With this proposed plan, Independence NHP pledges to achieve the even higher standards of excellence this singular site deserves.

The park is a place that embodies the courage and idealism of a remarkable group of citizens who came together to debate and then create a new government that became a model for modern democracies. The park is a place of value and meaning to all people - so much so that Independence Hall is a World Heritage Site. Visitors come here from all over the world to experience the place where a new concept of freedom was conceived.

The park also lies at the heart of a great American city - a living museum of historic sites, significant events, and diverse cultures. The city's history, institutions, and neighborhoods provide an invaluable setting for the park. There are unprecedented opportunities to forge spiritual and physical connections between the community and the seminal ideals and historic icons of the park. In the National Park Service's vision, we will work together to transform the visitor experience in the park and in the historic neighborhood beyond. Together, we will foster opportunities for experiences that promote reflection, learning and enjoyment. The park itself will play three key roles that define its relationships with visitors, organizations, and government:

First, the park will continue its role as responsible steward for the precious treasures it holds. It will apply the best preservation and curatorial techniques to the maintenance of its historic places, green spaces and priceless collections. Through its cultural resources management policies and procedures, the park will assure that these are preserved for future generations.

Second, the park will continue to serve as an educator and as a place where visitors learn about the people and events that created our nation. A broader menu of interpretation and education will enrich visits for the full range of visitors served by the park. In addition to telling compelling stories about the past, the park and its partners will present the contemporary relevance of these stories and foster a spirit of reverence for this national shrine.

Finally, the park will become a more active partner in the life of the city and region. INHP and the community play complementary roles: INHP in achieving quality stewardship and interpretation of the park; and the community in assuring preservation and development of the neighborhoods that surround the park. This partnership is essential to realizing the goals of the park and the city, and to assuring the highest quality experience for visitors. Steward, educator, and partner -- these are the roles that the park plays today and will more powerfully play on the stage of the future. They also guided development of the elements of the plan for the park.



The *PLAN* presents the most feasible means to meet the goals of the park and the community to enrich interpretive and educational opportunities, improve visitor orientation and services, and enhance heritage tourism. It will reinforce the park's identity and basic mission of preservation and interpretation by fostering synergy with the surrounding historic neighborhoods and cooperating institutions. The park and community will cooperate in strengthening INHP as the centerpiece of the larger Old Philadelphia District. Partners will extend the park's mission and impact into the city, and historical and physical links beyond park boundaries will be emphasized.

The following summary of the plan highlights the areas and actions that have been of most interest to the public. A full description of all actions and impacts is found in the final GMP.

INDEPENDENCE MALL. A new sequence of arrival and orientation will bring visitors first to the mall, which will become the focal point for a visit to the park and historic Philadelphia:

- Arriving at the **second block** of Independence Mall, visitors can park their cars in a renovated underground parking garage. Visitors arriving by bus will be dropped off on this block at a location to be determined.
- At the south end of the block, visitors will find a new **Gateway Visitor Center** to orient them to the park, city, and region.
- The second block also will be redeveloped to include other new educational and interpretive institutions – the **Independence Park Institute** adjacent to the visitor center, and the **National Constitution Center** at the north end of the block. A **gathering place** for civic and festive events will be the centerpiece of this block.
- The **first block** of the mall will remain essentially as it is now, with its central open space flanked by allees of trees. The **Liberty Bell Pavilion** could be enlarged, or demolished and replaced with a new, larger building. The outdoor **First Amendment rights space** and the restrooms will be relocated and improved. Future study of the locations of these elements will consider both existing and potential sight lines between the Liberty Bell and Independence Hall, and from Market, 5th and 6th Streets to and through the block.
- The **third block** of the mall will remain unchanged for the foreseeable future. If the second block is redeveloped as envisioned, the dynamics of use of the third block will change, and its treatment can be reconsidered. Upcoming design work will proceed for a **gateway element**, including signage and landscape features at the northwest end, to signal arriving visitors that they have entered the park and historic area. If the National Constitution Center requires a larger space than is available on the second block, the facility could be located on the third block.

INTERPRETATION AND VISITOR SERVICES. The park will continue to focus its interpretive programs and services on the founding of the nation from 1775 to 1800, using five key themes that tell the story of independence:



Orientation:

• The **Gateway Visitor Center (GVC)** will serve as the gateway to the park, the surrounding historic district, the city as a whole, and the region. Visitors will receive orientation to the significance and features of the park, city and region. Through personal services, exhibits and displays, visitors will gain a contextual understanding of the park and its surroundings, and receive information that will motivate them to develop personal itineraries that take advantage of a variety of resources and services available throughout the city.

Additional basic orientation and information also will be available at the Declaration (Graff) House, and within a small portion of the existing visitor center at Third and Chestnut Streets. The park also will place unstaffed orientation kiosks in other high traffic areas.

• The park and partners will develop **new visitor amenities**, including restrooms on the first and second blocks of Independence Mall, a cafe on the second block, and a bookstore and/or gift store at the GVC. An informal **picnic area** will be added to the existing landscape of the third block of the mall. An area for staging **civic and festive events** will anchor the second block.

• A **reservation system** for admission to Independence Hall during peak times will be instituted to decrease the amount of time visitors spend waiting in line, and allow them to visit more sites.

• The city will improve the neighborhood's **physical environment** so that the public feels more comfortable visiting the city's many historic, cultural and commercial attractions. The Greater Philadelphia Tourism Marketing Corporation will increase **awareness** of area resources. The Philadelphia Convention and Visitors Bureau will provide **pre-trip visitor information**.

Themes:

Independence Hall and related structures, physical reminders of the epic struggle for freedom and self-government that underlay the founding of the United States and modern democratic governments world-wide.

The evolution of the American idea of democracy as expressed in the Declaration of Independence and the United States Constitution.

Benjamin Franklin, the quintessential founding father, whose life, contributions and accomplishments speak to the best of the American character.

18th century Philadelphia, the political, economic, and cultural center of colonial America, whose central location and founding Quaker spirit of tolerance and freedom made it the logical birthplace for the new nation.

The Liberty Bell, an international symbol of liberty that, like our democracy, is fragile and imperfect, but endures.

• These stories will continue to be told primarily by the park, which will strengthen and expand its fundamental interpretive and educational programs. Interpretive rangers will use the park's historic core - principally the blocks between 3rd and 6th Streets and Market and Walnut Streets - as the places where the stories are told.



First Bank:

This building's first floor will house a permanent exhibit on the financial foundations of the new republic, while the second floor will be occupied by friends-of-the-park organizations and NPS staff on assignments or special projects.

Partners in Education:

Beyond the historic core, the northern two blocks of Independence Mall will be used to carry the story of independence to current times by serving as the site for large First Amendment activities, special events, exhibits, and participatory learning. Partners will develop the **Independence Park Institute**, and the **National Constitution Center** to present programs and exhibits that add to the park's stories and link them to that of the larger community:

The Independence Park Institute (IPI), a cooperatively developed and operated educational program, will inspire intellectual and emotional connections with the park's interpretive themes. Working with neighboring academic and historical institutions, the IPI will expand the methods, scope and availability of interpretation. A dynamic educational framework will be established, with special interest in culturally diverse exhibits, classes and conferences.

The National Constitution Center (NCC) will house permanent and changing exhibits and programs on the U.S. Constitution. These will enhance citizens' and international visitors' understanding of the meaning of the constitution by interpreting the ways in which it has shaped the path of the nation since 1800.

CIRCULATION. Most visitors travel to the park by auto, tour bus or school bus, and most of these vehicles arrive at the 6th Street exit of Interstate 676. The plan will reduce the current serious impact of visitor traffic in the park and historic district through a new system of handling vehicles closer to this point of arrival:

- More than 40% of park visitors arrive on **tour and school buses**. Buses will drop off and pick up passengers at a sheltered **bus area** on the second block of Independence Mall before moving on to park at city-designated remote locations beyond the historic area. The goal for the bus area is that it generate activity rather than act as a barrier to pedestrian use of the block. Ultimate decisions about its specific location on this block will consider this goal.

- **Parking for autos** will continue to be available in the underground parking garage beneath the second block of Independence Mall. The garage soon will be renovated by the Philadelphia Parking Authority. Improvements to directional signs and to the garage entrance will encourage visitors to park there immediately on arrival, rather than searching at length for on-street parking.

- The park will request that the city relocate the designated standing area for commercially operated **rubber-wheeled "trolleys"** away from the 500 block of Market Street; and the standing area for commercially operated **horse-drawn carriages** away from the 500 block of Chestnut Street. New locations for standing areas should be as close as possible to the new GVC, while not interfering with the new traffic patterns necessary to handle tourist-related traffic.

- The NPS proposes that the city close the **500 block of Chestnut Street** to vehicles in order to protect Independence Hall and to allow visitors to walk between Independence Hall and the Liberty Bell without the threat of moving traffic.



WASHINGTON SQUARE. This city block will be transferred to the National Park Service when it is rehabilitated by the Fairmount Park Commission and the American Revolution Patriots' Fund, in accordance with a 1991 agreement. In addition to its current uses as a neighborhood park and memorial to the Unknown Soldier of the American Revolution, Washington Square will become a place for interpretation about the 18th century African-American experience.

ADMINISTRATIVE FACILITIES. Most of the park's administrative offices will be relocated and consolidated at the **Merchants' Exchange Building**. At that time, the park's current headquarters at 313 Walnut Street will be rehabilitated for administrative uses or historic leasing. Additional space for vehicle storage, visitor protection equipment, and bulk storage to augment the undersized **maintenance facility** at Fifth and Manning Streets will be provided within or in conjunction with the National Constitution Center building. The existing **Third Street Visitor Center** will be rehabilitated for curatorial activities and park museum and study collections. Part of the collection will be displayed. A small orientation center also will remain in that building.

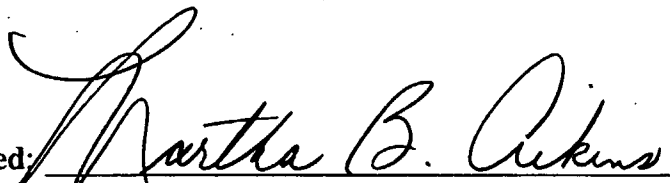


PUBLIC INVOLVEMENT

Public comment was requested, considered, and incorporated throughout the planning process. Initial public scoping meetings were held at the park in September 1993 to seek input for the planning process. Five public workshops were held in June 1994 and summarized in a September 1994 newsletter on park purpose and significance, interpretive themes, and management goals and objectives. Also in September 1994 a televised town workshop provided an opportunity for widespread consideration and response to park issues. Conceptual alternatives subsequently were presented at two public meetings for review and comment. In January 1995 two public meetings and a newsletter presented six draft alternatives for public review and comment. In August and September 1995, a newsletter, the *Draft General Management Plan / Environmental Impact Statement* and two public meetings allowed presentation and response to the NPS identification of its preferred alternative. Following modification of that alternative, comments again were requested through a descriptive newsletter and two public meetings in September 1996. A total of 16 formal public workshops and meetings were held and five newsletters were sent to the public as a means of keeping the public abreast of progress and eliciting public participation.

Approximately 1,400 copies of the *Draft General Management Plan / Environmental Impact Statement* were distributed in September 1995. Written comments were accepted for 60 days, and 62 comment letters were recorded. Thirty-four written comments were received on the September 1996 newsletter describing the new proposed alternative. All substantive comments were addressed by providing clarification of information, modifying the text, and/or directly responding in the abbreviated *Final General Management Plan / Environmental Impact Statement*.

Recommended:



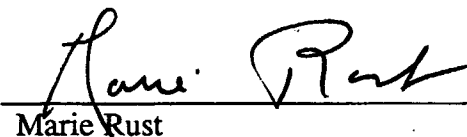
Date:

4/23/97

Martha Aikens

Superintendent, Independence National Historical Park
National Park Service

Approved:



Date: 4/23/97

Marie Rust

Director, Northeast Field Area
National Park Service

WITNESSES

APRIL 23, 1997

SIGNING GENERAL MANAGEMENT PLAN

INDEPENDENCE NATIONAL HISTORICAL PARK

Deirdre Gibson

Dennis Renshaw

James P. Rini

Shirley Miller

Karen M. Butler

Elie Jean Hammond

Dr. M. A. K.

Karna Cytles

James W. James

Brent D. Davis

David K. K.

Dil Haley

Chris Schiller

Independence National Historical Park

National Park Service

RECORD OF DECISION

Draft and Final General Management Plans/ Environmental Impact Statements

National Park Service (NPS) policy and Public Law 95-42 require the preparation of a general management plan for every unit of the national park system. Draft and final general management plans / environmental impact statements (DEIS and FEIS) for Independence National Historical Park, Pennsylvania, have been completed.

The *Draft General Management Plan / Environmental Impact Statement* was released to the public from September to October 1995. Following public review the proposed action (Alternative E) was modified and underwent a second round of review via newsletter during September and October 1996 and public meetings in September 1996. The modified alternative was titled "E1" in the newsletter to indicate change.

With the exception of the modified proposed action and some necessary corrections to data, a great deal of the material in the *Draft General Management Plan / Environmental Impact Statement* was unchanged; therefore, an abbreviated rather than full *Final General Management Plan / Environmental Impact Statement* was issued. This document consists of:

- (1) a description of the modified preferred action as presented in the newsletter and its costs and impacts consistent with the draft environmental impact statement
- (2) public comments received on the newsletter and agency responses
- (3) errata sheets from the *Draft General Management Plan / Environmental Impact Statement* that did not alter the DEIS analysis
- (4) NPS responses to public and agency comments on the *Draft General Management Plan / Environmental Impact Statement* and on the modified proposed action.

This abbreviated format is permitted by the Council on Environmental Quality regulation 40 CFR 1503.4(c). The *Final General Management Plan / Environmental Impact Statement* became available to the public on March 21, 1997.

Pursuant to the National Environmental Policy Act of 1969 and the Council on Environmental Quality regulation (40 CFR 1505.2), the NPS has prepared this record of decision to document the outcome of this planning process.

Prior to, and while formulating a range of alternatives for park development and management, the park and system support office staff conducted public meetings and published a series of newsletters. Both formats allowed exchanges of information, provided updates on the planning process, and shaped decision making.

DECISION (SELECTED ACTION)

The National Park Service will implement Alternative E1 as described in the abbreviated *Final General Management Plan / Environmental Impact Statement* and summarized as follows:

The plan presents the most feasible means to meet the goals of the park and the community to enrich interpretive and educational opportunities, improve visitor orientation and services, and enhance heritage tourism. It will reinforce the park's identity and basic mission of preservation and interpretation by fostering synergy with the surrounding historic neighborhoods and cooperating institutions. The park and community will cooperate in strengthening the park as the centerpiece of the larger Old Philadelphia District. Partners will extend the park's mission and impact into the city, and historical and physical links beyond park boundaries will be emphasized.

Independence Mall. A new sequence of arrival and orientation will bring visitors first to the mall, which will become the focal point for a visit to the park and historic Philadelphia:

- Arriving at the **second block** of Independence Mall, visitors can park their cars in a renovated underground parking garage. Visitors arriving by bus will be dropped off on this block at a location to be determined.
- At the south end of the block, visitors will find a new **Gateway Visitor Center** to orient them to the park, city, and region.
- The second block also will be redeveloped to include other new educational and interpretive institutions – the **Independence Park Institute** adjacent to the visitor center and the **National Constitution Center** at the north end of the block. A **gathering place** for civic and festive events will be the centerpiece of this block.
- The **first block** of the mall will remain essentially as it is now, with its central open space flanked by allees of trees. The **Liberty Bell Pavilion** will be replaced with a new, larger building. The outdoor **First Amendment rights space** and the restrooms will be relocated and improved. Future study of the locations of these elements will consider both existing and potential sight lines between the Liberty Bell and Independence Hall, and from Market, 5th and 6th Streets to and through the block.

· The **third block** of the mall will remain unchanged for the foreseeable future. If the second block is redeveloped as envisioned, the dynamics of use of the third block will change, and its treatment can be reconsidered. A **gateway element** will be established at the northwest end, including signs and landscape features to signal arriving visitors that they have entered the park and historic area. If the National Constitution Center requires a larger space than is available on the second block, the facility could be located on the third block.

Interpretation and Visitor Services. The park will continue to focus its interpretive programs and services on the founding of the nation from 1775 to 1800, using five key themes that tell the story of independence:

Orientation:

· The **Gateway Visitor Center (GVC)** will serve as the gateway to the park, the surrounding historic district, the city as a whole, and the region. Visitors will receive orientation to the significance and features of the park, city, and region. Through personal services, exhibits, and displays, visitors will gain a contextual understanding of the park and its surroundings and will receive information that will motivate them to develop personal itineraries that take advantage of a variety of resources and services available throughout the city.

· **Additional basic orientation and information** also will be available at the Declaration (Graff) House and in a small portion of the existing visitor center at Third and Chestnut Streets. The park also will place unstaffed orientation kiosks in other high traffic areas.

· The park and partners will develop **new visitor amenities**, including restrooms on the first and second blocks of Independence Mall, a cafe on the second block, and a bookstore and/or gift store at the Gateway Visitor Center. An informal **picnic area** will be added to the existing landscape of the third block of the mall. An area for staging **civic and festive events** will anchor the second block.

· A **reservation system** for admission to Independence Hall during peak times will be instituted to decrease the amount of time visitors spend waiting in line and allow them to visit more sites.

· The city will improve the neighborhood's **physical environment** so that the public feels more comfortable visiting the city's many historic, cultural, and commercial attractions. The Greater Philadelphia Tourism Marketing Corporation will increase **awareness** of area resources. The Philadelphia Convention and Visitors Bureau will provide **pre-trip visitor information**.

Themes:

Independence Hall and related structures, physical reminders of the epic struggle for freedom and self-government that underlay the founding of the United States and modern democratic governments worldwide

The evolution of the American idea of democracy as expressed in the Declaration of Independence and the United States Constitution

Benjamin Franklin, the quintessential founding father, whose life, contributions, and accomplishments speak to the best of the American character

18th century Philadelphia, the political, economic, and cultural center of colonial America, whose central location and founding Quaker spirit of tolerance and freedom made it the logical birthplace for the new nation

The Liberty Bell, an international symbol of liberty that, like our democracy, is fragile and imperfect, but endures

· These stories will continue to be told primarily by the park, which will strengthen and expand its fundamental interpretive and educational programs. Interpretive rangers will use the park's historic core – principally the blocks between 3rd and 6th Streets and Market and Walnut Streets – as the places where the stories are told.

First Bank:

This building's first floor will house a permanent exhibit on the financial foundations of the new republic and changing exhibit space, while the second floor will be occupied by friends-of-the-park organizations and NPS staff on assignments or special projects.

Partners in Education:

· Beyond the historic core, the northern two blocks of Independence Mall will be used to carry the story of independence to current times by serving as the site for large First Amendment activities, special events, exhibits, and participatory learning. Partners will develop the **Independence Park Institute** and the **National Constitution Center** to present programs and exhibits that add to the park's stories and link them to that of the larger community:

The Independence Park Institute (IPI), a cooperatively developed and operated educational program, will inspire intellectual and emotional connections with the park's interpretive themes. Working with neighboring academic and historical institutions, the Independence Park Institute will expand the methods, scope and availability of interpretation. While the primary focus of the Independence Park Institute will be to

deliver structured educational programs for school children, a dynamic educational framework will be established with a special interest in culturally diverse exhibits, classes, and conferences.

The National Constitution Center (NCC) will house permanent and changing exhibits and programs on the U.S. Constitution. These will enhance citizens' and international visitors' understanding of the meaning of the constitution by interpreting the ways in which it has shaped the nation.

Circulation. Most visitors travel to the park by auto, tour bus, or school bus, and most of these vehicles arrive at the 6th Street exit of Interstate 676. The plan will reduce the current serious impact of visitor traffic in the park and historic district through a new system of handling vehicles closer to this point of arrival:

- More than 40% of park visitors arrive on **tour and school buses**. Buses will drop off and pick up passengers at a sheltered **bus area** on the second block of Independence Mall before moving on to park at city-designated remote locations beyond the historic area. The goal for the bus area is that it generate activity rather than act as a barrier to pedestrian use of the block. Ultimate decisions about its specific location on this block will consider this goal.

- **Parking for autos** will continue to be available in the underground parking garage beneath the second block of Independence Mall. The garage soon will be renovated by the Philadelphia Parking Authority. Improvements to directional signs and to the garage entrance will encourage visitors to park there immediately on arrival, rather than searching at length for on-street parking.

- The park will request that the city relocate the designated standing area for commercially operated **rubber-wheeled "trolleys"** away from the 500 block of Market Street and the standing area for commercially operated **horse-drawn carriages** away from the 500 block of Chestnut Street. New locations for standing areas should be as close as possible to the new Gateway Visitor Center while not interfering with the new traffic patterns necessary to handle tourist-related traffic.

- The National Park Service proposes that the city close the **500 block of Chestnut Street** to vehicles in order to protect Independence Hall and to allow visitors to walk between Independence Hall and the Liberty Bell without the threat of moving traffic.

Washington Square. This city block will be transferred to the National Park Service when it is rehabilitated by the Fairmount Park Commission and the American Revolution Patriots' Fund, in accordance with a 1991 agreement. In addition to its current uses as a neighborhood park and memorial to the Unknown Soldier of the American Revolution, Washington Square will become a place for interpretation about the 18th century African-American experience.

Administrative Facilities. Most of the park's administrative offices will be relocated and consolidated at the **Merchants' Exchange Building**. At that time, the park's current headquarters at 313 Walnut Street will be rehabilitated for administrative uses or historic leasing. Additional space for vehicle storage, visitor protection equipment, and bulk storage to augment the undersized **maintenance facility** at Fifth and Manning Streets will be provided in or in conjunction with the National Constitution Center building. The existing **Third Street Visitor Center** will be rehabilitated for curatorial activities and park museum and study collections. Part of the collection will be displayed. A small orientation center also will remain in that building.

OTHER ALTERNATIVES CONSIDERED

Six alternatives to the proposed action were considered and are summarized in the attached chart.

BASIS FOR DECISION

As explained in the *Final General Management Plan / Environmental Impact Statement*, the National Park Service identified a vision for the future of the park and a set of goals and management objectives that guided alternatives generation. As cooperating agencies, the City of Philadelphia and the Commonwealth of Pennsylvania also identified goals and concerns for Independence National Historical Park. After evaluation of public comments received on both the six alternatives provided in the draft plan and the new alternative described in the September 1996 newsletter, the National Park Service determined that the seventh alternative (now the selected action) best balances the statutory mission of the National Park Service to provide long- term resource preservation while allowing for desirable and appropriate levels of visitor use and site interpretation. The selected action provides for projected growth in visitation, and integration of park programs and interpretation into the surrounding neighborhoods. The selected action provides the best opportunity to fulfill the park's vision and the principles that guided planning while meeting the needs and expectations of the city, the commonwealth, and the local community. The *General Management Plan / Environmental Impact Statement* complies with provisions of applicable laws, guidelines, and policies of the National Park Service, the park's enabling legislation, and with agreements entered into with various governmental and private entities during the development of this plan.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

A record of decision must identify the environmentally preferable alternative, which is that alternative that causes the least damage to the biological environment and that best protects, preserves, and enhances resources. None of the alternatives would damage the biological environment of the park and all alternatives protect and preserve park resources.

SUMMARY OF ALTERNATIVES

	Alternative A (No Action)	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
Concept	Baseline to allow comparison with existing conditions	Concentration on the resources and park setting with focus on the 1775-1800 period; five interpretive themes expressed through the key 25-year period; landscape treated as a commemorative setting; physical and programmatic focus internal and boundaries more distinctive	Education about the evolution of democracy for all ages and in a variety of forms; new arrival sequence on Independence Mall, gateway to park	Park identity and interpretive mission emphasized by building on the synergy of the park and surrounding neighborhoods and cooperating institutions; park as focal point of historic district; connections to historic neighborhoods emphasized; new arrival sequence on Independence Mall, gateway to park	Builds synergy with historic neighborhoods and cooperating institutions with the park as focal point; physical links with the city and the region; park identity and interpretive mission emphasized by building on the synergy of the park and surrounding neighborhoods and cooperating institutions; new arrival sequence on Independence Mall, gateway to park	Park as focal point of historic district; connections to historic neighborhoods emphasized; differs from other alternatives in arrangement of physical development and concentration of activity on mall; park identity and interpretive mission emphasized by building on the synergy of the park and surrounding neighborhoods and cooperating institutions; new arrival sequence on Independence Mall, gateway to park
Cultural Resources	Would continue as under current management	Collections better cared for and better displayed in a new building on the third block; some structures adaptively reused; Liberty Bell in new display area on second block	Adaptive reuse for educational purposes emphasized; Liberty Bell in new structure for better preservation and interpretation; collections better cared for and better displayed in a new building on the second block; some structures adaptively reused	Cooperative work with others to ensure resource preservation; Liberty Bell display area redesigned for better preservation and interpretation; collections better cared for and better displayed in a new building on the third block; some structures adaptively reused; rehabilitate visitor center for park collections; some structures adaptively reused	Historic preservation emphasized; Liberty Bell display area redesigned for better preservation and interpretation; collections better cared for and better displayed in a new building on the third block; rehabilitate Third Street visitor center for additional park collections; some structures adaptively reused	Cooperative efforts for preservation beyond park boundaries; Liberty Bell display area on second block; some structures adaptively reused; third street visitor center adaptively used for curatorial storage and display
Visitor Experience	Constitution Plaza on second block; improvement of interpretive services to better emphasize period of 1775-1800; National Constitution Center outside park	New visitor center on second block; informal classrooms and interpretation there and at Third Street center, at the Graff House, Franklin Court, and at kiosks; National Constitution Center in current visitor center	New jointly operated information/orientation center on second block; interpretation there and at current visitor center (which would also house the National Constitution Center), at Graff House, Franklin Court, and kiosks; Independence Park Institute programs would be held inside and outside the park	New regional visitor center operated with city (third block), education and interpretation expanded to include multicultural nature of surroundings; informal classrooms near new visitor center; National Constitution Center on third block of mall	Interpretation and education emphasized using Independence Park Institute; cooperative programs dominant; new jointly operated regional visitor center (second block); National Constitution Center on third block	Jointly operated regional visitor center on second block; programs developed cooperatively; architectural collection used as a basis for study center/museum; Independence Park Institute on third block with seminar rooms and lodging; National Constitution Center on second block
Natural Resources	Would continue as under current management	Same as alternative A	Same as alternative A	Same as alternative A	Same as alternative A	Same as alternative A
Operations and Administration	Personnel numbers and conditions of facilities unchanged; partnerships sought for visitor services and gardens; Judge Lewis fountain removed	Multipurpose building for curatorial activities, collections, vehicle storage, bulk storage, and visitor protection uses on the third block; partnerships sought for visitor services and gardens	New informational/orientation complex; curation, collections storage, vehicle storage, bulk storage, and visitor protection uses accommodated; partnerships sought with city and region entities for educational and interpretive activities	Multipurpose facility on third block for storage; curation and collections in current visitor center; partnerships sought for common goals	Multipurpose facility on third block for vehicle and bulk storage and visitor protection uses; curation and collection activities in current visitor center	Current visitor center used for architectural study collection, curation, maintenance storage; vehicle, bulk storage in Second Street parking garage; new multipurpose building would accommodate some storage, maintenance-related functions
Circulation	Some design changes would improve visitor safety; work with city to relocate carriages and trolleys	Arrival on second block of Independence Mall at new visitor center, movement to the Liberty Bell, Independence Hall, and along east-west blocks; 500 block of Chestnut closed; relocation of carriages and trolleys to near new information/orientation center; bus parking outside park	Arrival on second block of Independence Mall; movement to the Liberty Bell, Independence Hall, and along east-west blocks; 500 block of Chestnut closed; relocation of carriages and trolleys to near new information/orientation center; bus parking outside park	Arrival on third block; visitors would move on to the Liberty Bell and Independence Hall; 500 block of Chestnut closed to traffic; new area for carriages and trolleys developed near new regional visitor center; bus parking outside park	Arrival at new visitor center, second block; parking offsite for buses, second block underground for cars; unsafe crossings minimized, 500 block of Chestnut closed; new area for carriages and trolleys developed near new regional visitor center	Arrival on second block, pickup/dropoff at south end of third block; Chestnut narrowed, traffic lights timed to create gaps, no parking or stopping allowed; new area for carriages and trolleys developed near new visitor center; bus parking outside park
Socioeconomic	Continue same activities and facilities as at present	Independence Mall as the gateway; development with emphasis on second and third block of Independence Mall	Independence Mall as the gateway; Constitution Plaza (special events), and picnic seating area	Independence Mall as gateway with emphasis on second and third block	Independence Mall as gateway with emphasis on second and third block	Independence Mall as gateway with emphasis on second and third block

**Abbreviated Final
General Management Plan
Environmental Impact Statement**

**Independence National Historical Park
Philadelphia, Pennsylvania**

Abstract

This *Abbreviated Final General Management Plan / Environmental Impact Statement* describes and analyzes a new preferred alternative (now called "the proposed action") for management and use of Independence National Historical Park. This plan was developed following review of the *Draft General Management Plan / Environmental Impact Statement* of August 1995 and is designed to be used in conjunction with it. (The proposed action was also the subject of a newsletter and public meetings held in September 1996.) Together, the draft and final documents provide the reader with an understanding of park resources, planning issues, alternatives considered, environmental considerations, and other background data. The documents respond to comments submitted by the agency, by state and local government, and by the public as a result of 16 public meetings and workshops and five newsletters during the planning process.

This document consists of four sections: (1) a description of the proposed action (alternative E1 from the September 1996 newsletter) and an analysis of its impacts, (2) public review comments on alternative E1 as described in the September 1996 newsletter and responses to them, (3) corrections to the *Draft General Management Plan / Environmental Impact Statement* of August 1995, (4) public review comments received on the *Draft General Management Plan / Environmental Impact Statement* of August 1995 and responses to them.

A vision and management objectives for the park are presented. The methods for achieving the vision and objectives are described, as are the environmental consequences of implementation. Actions include continued protection of the cultural, natural, and human environments, cooperative regional efforts for visitor services, and reliance on cooperative activities to carry out the goals of the park and community.

This *Abbreviated Final General Management Plan / Environmental Impact Statement* along with the *Draft General Management Plan / Environmental Impact Statement* will constitute the final general management plan for the park.

This plan will become final upon signature of a record of decision by the field director, Northeast Area, approximately 30 days after issuance of the plan. If you have questions, please contact:

Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, Pennsylvania 19106
215-597-8787



SUMMARY

The National Park Service has prepared this *Abbreviated Final General Management Plan / Environmental Impact Statement* to guide management of Independence National Historical Park over the next 10-15 years. It builds on an earlier document, the *Draft General Management Plan / Environmental Impact Statement* (August 1995) and includes the results of extensive public review and comments. The product of three years of research, public participation, and planning, the plans comprise the results of the first large-scale reconsideration of the park's role, resources, and operations in more than 20 years.

The two documents are intended to be used together for a full understanding of all alternatives and the associated environmental consequences. The draft plan described six alternatives, including a no-action alternative and a preferred alternative. The potential effects of each alternative were described and compared. The draft plan also included the following information, which has not been reprinted in this document, but is incorporated by reference:

- a description of the facilities and resources of the park
- a detailed description of the park's interpretive themes
- a description of planning issues affecting development of the *General Management Plan*
- a description of related planning efforts and projects outside the purview of the park
- a description of the use of partnerships as a management and implementation tool
- a description of the environment surrounding the park that would be affected by actions taken on behalf of and within the park
- a number of appendixes including park legislation, park statistics, a bibliography, and a list of preparers of the document

Following the August 1995 publication of the draft plan with its preferred alternative, two public meetings and a public review and comment period were held by the National Park Service. The National Park Service studied and considered all the comments received in writing and in person, as well as a number of drawn plans and illustrations submitted both by the public and through a formal process funded by a donor. (Please refer to section 2 of this document for written comments on the draft plan.) This public dialogue and many of the submitted ideas enriched our understanding of the issues and opportunities and suggested that further exploration of alternatives was needed. While all alternatives addressed the entire park, the public gave particular attention to Independence Mall because of its urban design possibilities and the potential to redevelop it to better serve visitors to the park and region.

One of the contributions of ideas received was from The Pew Charitable Trusts, a Philadelphia-based national private philanthropy that supports nonprofit activities in the areas of culture, education, environment, health and human services, public policy, and religion. Pew sponsored separate research into the potential for enhancing tourism in the Philadelphia region for the purpose, among others, of economic development for the city and surrounding region. Both Pew's tourism study and the GMP process, although conducted separately, led to proposals to develop a visitor center on Independence Mall and to redevelop the mall to serve as a gateway to the park and the surrounding historic district, city, and region. A Gateway Visitor Center in

this location offers the possibility of serving and orienting far more visitors than is possible in the park's existing visitor center at Third and Chestnut Streets. For the city and region this represents a key move in attracting and introducing many more visitors to the innumerable resources offered in and beyond the park.

Based on the convergent conclusions regarding visitor service opportunities offered by the mall, Pew engaged Venturi, Scott Brown & Associates, a Philadelphia-based architecture and planning firm, who studied and analyzed the research developed to date and the extensive comments from the public and state and local governments. The firm developed three alternative approaches for siting a Gateway Visitor Center and positioning other elements on the mall.

The National Park Service has carefully considered the alternatives and underlying concepts prepared by Venturi, Scott Brown & Associates, as well as many others offered by the public, in light of stated objectives for the mall, the need for sensitivity toward Independence Hall and the Liberty Bell, and based on NPS experience in the operations necessary to manage the park and provide for visitors. Many suggestions were made to reposition some of the proposed elements on the mall, as well as to provide limited retail and food services in order to enhance the visitor experience and add vitality to the second and third blocks of the mall. Some of the suggestions were adopted, and the conceptual plan for the mall was revised. The result was a revised preferred alternative, which replaced the preferred alternative that was presented in the *Draft General Management Plan / Environmental Impact Statement*.

The revised preferred alternative was the subject of an August 1996 newsletter and two additional public meetings held September 24-25, 1996. Now called the "proposed action," it is the subject of this *Abbreviated Final General Management Plan / Environmental Impact Statement*. As was the case with the alternatives presented in the draft, the drawing and text describing the proposed action continue to be conceptual or quite general.

Alternative E-1 (the proposed action) describes how the park's mission of preservation and interpretation would be best accomplished to meet new conditions. At Independence National Historical Park these new conditions include growing visitation and occasional overcrowding, increasing interest in making the park's interpretive programs more meaningful to diverse audiences, the growth in offerings by area institutions that can enrich the visitor experience, the remarkable renewal of the adjacent Old City and Society Hill neighborhoods, and Philadelphia's and Pennsylvania's strong interest in tourism development.

The plan establishes goals for every aspect of the park, including the use of facilities and land for interpretation, resource protection, visitor services, and the visitor experience. It also considers how Independence National Historical Park, like all national parks, can do more with less in accomplishing its primary objectives: preservation and interpretation. An important means by which the park can support this objective will be through mutually productive partnerships with government, business, and nonprofit organizations.

The proposed action presents the most feasible means to meet the goals of the park and the community to enrich interpretive and educational opportunities, improve visitor orientation and services, and enhance heritage tourism. It would reinforce the park's identity and basic mission of preservation and interpretation by fostering synergy with the surrounding historic neighborhoods and cooperating institutions. The park and community would cooperate in strengthening Independence National Historical Park as the centerpiece of the larger Old Philadelphia District, which includes the area from Eighth Street to the Delaware River between

South Street and the Vine Street Expressway (I-676). Partners would extend the park's mission and impact into the city and region, and historical and physical links would be emphasized.

A new sequence of arrival and orientation would bring visitors first to Independence Mall, where they would find a new, jointly operated Gateway Visitor Center to orient them to the park, city, and region. The mall would become the focal point for a visit to the park and historic Philadelphia. The mall also would be redeveloped to include other new educational and interpretive institutions — the Independence Park Institute and the National Constitution Center — and gathering places for civic and festive events.

Alternative E-1 largely replicates Alternative E. However, E-1 proposes some important differences concerning the position of new elements on the mall and the provision of new services:

- E-1 proposes that a Gateway Visitor Center and the Independence Park Institute be located on the southern end of the second block of the mall (the block between Market and Arch and Fifth and Sixth Streets).
- E-1 proposes that the National Constitution Center be located at the northern end of the second block.
- E-1 proposes to provide limited food service for visitors on the second block and a bookstore and gift shop inside the Gateway Visitor Center. Space in the visitor center could be leased for private events.
- E-1 allows for the possibility of minor redesign of the first block of the mall to accommodate a new or enlarged Liberty Bell Pavilion, relocated outdoor First Amendment rights space, relocated restrooms, and improved sight lines.

This document, with the *Draft General Management Plan / Environmental Impact Statement*, constitutes the general management plan for the park and meets requirements set forth under the National Environmental Policy Act (40 CFR 1503.4 [c]) and Department of the Interior guidelines for the development of plans for units of the national park system. Alternatives for resource protection, visitor use, and management of the park in conjunction with the assessment of the impacts of these actions fulfill requirements for an environmental impact statement. Requirements for public participation in data collection and alternative development have also been met.

The draft plan will not be reprinted. For the reader's convenience, however, the changes that would have been made to the draft plan have been reproduced in Section 3 of this document. Text that would have been removed from the draft document appears as ~~remove~~. Text to be added appears as **add**. Maps or graphics are included only when changes or corrections have been made. Copies of the *Draft General Management Plan / Environmental Impact Statement* can be obtained by visiting the park's Web site at <http://www.libertynet.org/~inhp> or by contacting the superintendent at the address shown on page i.



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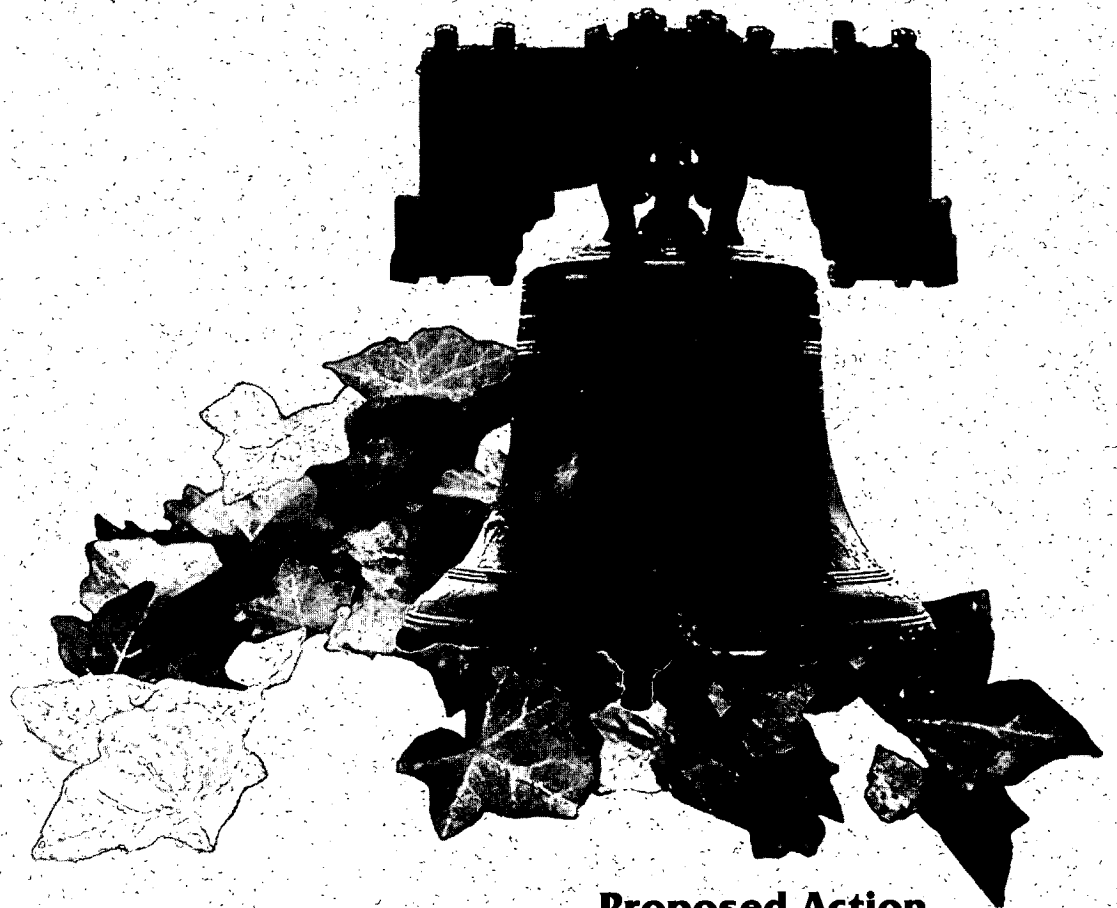
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**SECTION 4: PUBLIC INVOLVEMENT LETTERS, DRAFT GENERAL MANAGEMENT PLAN /
ENVIRONMENTAL IMPACT STATEMENT**

Section 1



Proposed Action



THE PROPOSED ACTION FOR INDEPENDENCE NATIONAL HISTORICAL PARK

VISION

The *General Management Plan* for Independence National Historical Park presents a new vision for the park in the 21st century. The vision begins with preserving and interpreting the past, the mission articulated by Congress in the park's founding legislation. But it also reaches beyond. For we have learned that the public believes that the park can become a more vital anchor institution, offering visitors an even more memorable and inspirational experience. With this plan, Independence National Historical Park pledges to achieve the even higher standards of excellence that this singular site deserves.

The park is a place that embodies the courage and idealism of a remarkable group of citizens who came together to debate and then create a new government that became a model for modern democracies. The park is a place of value and meaning to all people — so much so that Independence Hall is a world heritage site. Visitors come here from all over the world to experience the place where a new concept of freedom was conceived.

The park also lies at the heart of a great American city — a living museum of historic sites, significant events, and diverse cultures. The city's history, institutions, and neighborhoods provide an invaluable setting for the park. There are unprecedented opportunities to forge spiritual and physical connections between the seminal ideals and historic icons of the park and the broader community.

In the NPS vision, the park and the community will work together to transform the visitor experience in the park and in the historic neighborhood beyond. Together we will foster opportunities for outstanding and memorable experiences that promote reflection, learning, and enjoyment. The park itself will play three key roles that define its relationships with visitors, organizations, and government.

First, the park will continue its role as responsible steward for the precious treasures it holds. It will apply the best preservation and curatorial techniques to the maintenance of its historic places, green spaces, and priceless collections. Through its cultural resources management policies and procedures, the park will ensure that these are preserved for future generations.

Second, the park will continue to serve as an educator and as a place where visitors learn about the people and events that created our nation. A broader menu of interpretation and education will enrich visits for the full range of visitors served by the park. In addition to telling compelling stories about the past, the park and its partners will present the contemporary relevance of these stories and will foster the spirit of reverence that people bring to this national shrine.

Finally, the park will become a more active partner in the life of the city and region. Independence National Historical Park and the community play complementary roles: park staff in achieving quality stewardship and interpretation of the park, and the community in ensuring sensitive preservation and development of the neighborhoods that surround the park. Partnership between the park and the community is essential to realizing the goals of the park, neighborhood residents, and the city, and to ensuring the highest quality experience for visitors.

Steward, educator, and partner — these are the roles that the park plays today and will more powerfully play on the stage of the future. They also guide development of the elements of the NPS proposed action, which is described in this chapter.

CONCEPT

The proposed action would provide the most effective and feasible means to meet the goals of the park and community to protect cultural resources, enrich interpretive and educational opportunities, improve visitor orientation and services, and enhance heritage tourism.

This proposal reinforces the park's identity and mission by fostering synergy between it and the historic neighborhoods and cooperating institutions that surround it. The park and community would cooperate in strengthening Independence National Historical Park as the centerpiece of the Old Philadelphia District. Partners would play substantial roles in expanding the park's mission and impact into the city and the region.

URBAN DESIGN PRINCIPLES THAT GUIDED DEVELOPMENT OF THE PROPOSED ACTION

The proposed action envisions extensive changes for Independence Mall, the three-block area that comprises about 30% of the park's area, in order to support the vision of transforming the visitor experience. Originally developed by the commonwealth and the city as Independence Mall State Park and transferred to the National Park Service in 1974, the space has borne little physical or functional relationship to the rest of the national park and also is physically isolated from the neighborhoods beyond. The following underlying framework of urban design principles was developed to guide placement of new development on the Mall. Each of the 13 principles responds to at least one of four broad goals for the Mall:

- Establish the Mall as a setting that is appropriate in size and use for Independence Hall
- Maximize visitor choice
- Reinforce the implicit connection between the park's urban setting and its mission and significance
- Preserve and define the parameters of maximum flexibility for development of the Mall

Scale of Independence Hall. Organize buildings, open space, and circulation to maximize understanding of both the scale and the significance of Independence Hall.

Much of Independence Hall's visual and intellectual power derives from the discrepancy between its relative smallness and the enormous impact of the ideas formed in and symbolized by it. Architecturally it is a finely detailed building, and some of the best views of it are oblique, close, and partial — as demonstrated by the satisfying views and setting of the building on its south side. Redevelopment of Independence Mall should ensure that as the visitor experiences the park, a concrete understanding emerges of Independence Hall as a building and a site of real events as well as an abstract symbol.

Views and Vistas. Allow for a variety of long and short vistas and views of Independence Hall and other features on and adjacent to the Mall, consistent with the diminutive scale of those features.

Buildings, open space, and circulation should be organized so as to allow Independence Hall and its environs to be approached and seen from a variety of directions, rather than suggesting that there is an ideal single point of view to Independence Hall. The sense of choice and discovery emerging from having such multiple views available relates directly to the mission and significance of the park.

The Axis. Make the existing axis gentle and commensurate with the size of Independence Hall. Use it as an organizing device for the placement of buildings and spaces.

The axis and its associated shaft of space dwarf Independence Hall and dominate the Mall. The issue is not whether there should be an axis but rather how strong that axis can be and how far north it should extend. Freeing the Mall from a rigidly symmetrical axis allows the creation of flexible and functional spaces and relationships among buildings, a sense of outdoor rooms, a choice of paths, and a variety of views.

Asymmetry. Organize buildings and circulation to respond to the differing characters of the east and west edges of the Mall.

There are genuinely and perceivably different conditions and opportunities along the Mall on Fifth and Sixth Streets. These differences in themselves can influence the placement and treatment of certain activities and functions within and along the Mall. A Mall design that is absolutely symmetrical along its north-south center line precludes the possibility of accommodating these differences and implies a degree of control and conformity that contradicts the message of freedom symbolized by the park.

The Grid. Position buildings and open space in deference to what is suggested by the city's grid plan.

William Penn's grid plan, in which buildings and spaces derive their importance from many factors other than their physical position, is inherently communal and egalitarian and very much in the spirit of the park. As a planning device the grid fosters a community of structures while suggesting choice and freedom to those moving within it. It is possible for the Mall to have its own identity as a place and still be a part of the life and structure of the rest of the city. In redeveloping the Mall, reinforcement of the grid through placement of buildings and open space can reduce the Mall's isolation from the rest of the city's urban fabric.

Sequence. Organize buildings and open space to enable visitors to circulate among them at their own pace and in pursuit of their own interests.

There has been much discussion about whether there is a single appropriate visitor sequence and to what extent the design of the Mall should encourage or even force that sequence. Most visitors are likely to proceed from the visitor center to the Liberty Bell and Independence Hall, later visiting the other attractions offered on the Mall, in the park, and in the rest of the city. While recognizing this pattern, neither the design nor the operation of the Mall should force it. In keeping with the spirit of the park's mission and significance and its urban setting, and with the freedom of

possibility implicit in the city grid that organizes that setting, the informed visitor should be free to follow whatever path of discovery and learning he or she chooses.

Outdoor Space. Recognize the open space of the Mall as the key element contributing to a demonstration of the values and significance for which the park stands.

Even if the ambitious development plan for the Mall is fully realized, it will still consist primarily of open space. That open space cannot be treated simply as the decoration or background for the Mall's buildings. Instead, it is the arena in which the vitality and significance of major park themes would continue to take place in full public view. Political demonstrations and assemblies are the most direct example, and appropriate space for them is a fundamental requirement for the Mall. Just as pertinent are the many special events that by occurring in the Mall's open space help maintain the connection between the park and the life of the city. Most powerful is the daily stream of pedestrians visiting and using the park, going about their business, and through their activity exhibiting what a free society looks like.

The Pedestrian Environment. Enhance the Mall's pedestrian environment by reconnecting it with the city around and beyond it.

A pedestrian environment that uses and provides views from the grid's corner crossings, that does not separate pedestrians within the Mall from those around it, and that encourages diagonal circulation across the Mall would support reconnection of the Mall with the city, making it part of the city fabric and civic life. The existing continuous separation of the interior of the Mall from the flanking sidewalks along the first and second blocks not only divorces the Mall from the life of the city but announces that separation.

Vehicles. Integrate a new, logical vehicular system into the Mall design, recognizing that concentrating vehicular arrival concentrates the people and thereby enhances the urban density of the Mall.

Most visitors to Independence National Historical Park arrive by car or bus, so the vehicular circulation system for arrival and departure must go well beyond merely accommodating vehicles and must also be an integral aspect of the design and the visitor experience. Such a system would recognize that cars and buses, though problematic on many levels, nevertheless deliver most of the people who activate and enliven the Mall. The vehicular system should ensure this activation, minimize negative impact on existing city traffic patterns, and be attractive and understandable enough to discourage undesirable traffic patterns.

Urban Linkages. Place buildings and associated design elements along Market and Arch Streets so as to help reestablish the physical continuity of the street.

The scale and nature of the development under consideration for the Mall provides the opportunity to recapture a sense of the continuity of the street — especially along Market Street, the city's major east-west street and a central component of the plan that determined the city's organization and appearance. Since that plan and the city that emerged from it would be interpreted in the visitor center, it is appropriate to reinforce it through the placement of buildings and open spaces in the development of the Mall.

Proximity. Place the visitor center so that it is close to and has a direct visual relationship with Independence Hall and the Liberty Bell.

Proximity of the visitor center to the park's two primary destinations will maximize the number of visitors who have access to the kind of information that would be available in the center — information that would help explain the park's mission and significance within the broader context of the city and region. Proximity also would ensure that visitors with disabilities would have the best opportunity to see Independence Hall and the Liberty Bell with the full benefit of the orientation provided in the visitor center.

Height. The height of buildings on the Mall may increase the farther north they are from Independence Hall.

While it is premature to specifically define the dimension of any potential height limitations on construction within the Mall, limitations ultimately will be imposed. At present it is clear that such limitations on the first block must respect the height and scale of Independence Hall, and that if additional height is needed it will be obtained in buildings farther north. Whatever height limitations pertain will derive from careful study of sight lines — especially to and from Independence Hall — and from analysis of the spatial volume that is defined by conditions around the perimeter of the Mall.

Third Block. Concentrate development on the second block, recognizing that such development would alter the character and usage of the third block.

The plan recommends a variety of new buildings and open spaces on the Mall. Concentrating them fosters the density and activity that are such desirable aspects of the urban park, while simultaneously reserving undeveloped space on the third block to respond to new circumstances created by the development. Such a response could range from retaining the block unchanged to undertaking additional (and presently unidentified) development. Flexibility is preserved as long as appropriate.

Management Goals and Strategies

Goals and strategies for the future of the park were identified and articulated in public workshops, meetings, and newsletters and modified through incorporation of public comment and consideration of technical issues, legislation, and policy. The following goals and strategies were a guiding force in the development of alternative plans.

- (1) We will use the park's interpretive themes and programming to provide an educational and inspirational experience that fully conveys the meaning of the democratic ideals that created this nation by:

Making History Compelling

We will incorporate methods of interpretation that make the park's message relevant to our modern experiences and concerns, personal and meaningful to us as citizens of the nation and the world, and engaging and stimulating for children.

Enriching the Stories

We will continue to concentrate on the themes and stories of the colonial and early federal period but will add layers of physical and temporal connections to the surrounding city and region that will enrich every story and every visitor experience.

Broadening the Stories

We will interpret the stories of diverse people and populations who effected and who have been affected by the founding of the nation and the evolution of American freedoms.

Telling the Philadelphia Story

We will work with the city's community of cultural institutions to provide seamless and integrated interpretation of the city's history.

(2) The park will share in creating outstanding visitor experiences by:

Orienting Visitors

We will work with state, city, and private partners to provide pre-arrival and onsite visitor orientation and information that provides a comprehensive view of the park, city, and region. Orientation will recognize the varying needs of visitors and their multiple arrival points to the park and Philadelphia, help manage the flow of visitor traffic throughout the park and associated NPS sites in the city, and inform visitors about the multitude of choices of cultural institutions and other amenities throughout the city and region that are part of a complete experience.

Strengthening Independence Mall

Planning and design for the Mall will respect the historical significance of Independence Hall and the Liberty Bell and provide a dignified setting for both; provide orientation and visitor services in accordance with law, policy, and goals common to the National Park Service and the community; and establish physical and programmatic links with the surrounding city and region.

Emphasizing Pedestrians

We will clarify circulation routes and reinforce a pedestrian environment that will strengthen the character of the park and increase safety, and we will work with city and private partners to extend a high quality pedestrian environment into the surrounding historic area.

Fostering Special Uses

We will continue to provide a setting for First Amendment rights demonstrations, ceremonies, and other activities that are directly related to the park's purpose, significance, and management philosophy. We will provide locations for other activities that enliven the experience of the park and do not denigrate park resources.

Securing the Visitor Experience

We will work with neighborhood organizations and the city to foster public safety so that visitors can fully enjoy their park experience and the surrounding urban environment.

Enhancing Heritage Development

We will work with city, state, and community partners to develop the Old Philadelphia District as a cultural destination that is recognized for the quality of its resources, its historical authenticity, and its accessibility.

- (3) The park will act as a leader and advocate in historic preservation by:

Stewarding Our Resources

We are implementing a proactive utilities infrastructure program and a comprehensive facilities management program for the park's buildings and grounds using sustainable design concepts to protect and maintain the exceptional and irreplaceable historic resources.

- (4) The park will use administrative and management techniques that uphold the mission and these goals by:

Concentrating on People

We will continue to build a skilled, dynamic, and diverse staff that reflects the nation's multicultural population in order to stabilize the work force and improve morale while encouraging professional growth in order to provide the highest quality services to visitors and the best protection of the resources.

Working through Cooperative Initiatives

We will work with the community to establish and meet common goals for interpretation, preservation, and the visitor experience.

PARKWIDE ACTIONS

Cultural Resource Management

As steward of its priceless collection of buildings and artifacts, the park would continue to reach for the highest standards of historic preservation. A number of structures would be adaptively reused following NPS guidelines, as described under "Site-Specific Actions," below. The park would strive to better house and show its collections. And through the Independence Park Institute, the park would share its knowledge of state-of-the-art preservation techniques and technologies in a series of new programs created in cooperation with area preservation and educational organizations.

Gardens in the park are distinctive, and all but one would be retained. Gardens at St. Joseph's Church, Signer's Park, Christ Church (along Market Street), Bishop White House, Franklin Court, City Tavern, Carpenter's Hall, and Todd House as well as the St. George, Magnolia, Rose, and 18th Century Gardens would be unchanged. The walled Andrew Hamilton Garden on the Judge Lewis Quadrangle would be removed because the walls preclude safe visitor use of the space. The walled garden at the Free Quaker Meeting House could be redesigned to better connect the site with the rest of the Judge Lewis Quadrangle. Partners would be sought to assist in the management of some of the most important gardens.

Visitor Experience

The proposed Gateway Visitor Center would serve as the gateway to the park, the surrounding historic district, the city as a whole, and the region. Visitors would receive orientation to the significance and features of the park, city, and region. Through personal services, exhibits, and displays, visitors would gain a contextual understanding of the park and its surroundings and would receive information that would motivate them to develop personal itineraries that would take advantage of a variety of resources and services available throughout the city.

A reservation system for admission to Independence Hall during peak times would be instituted to decrease the amount of time visitors spend waiting in line, which would allow them to visit more sites.

The park and partners would develop new visitor amenities, including restrooms on the first and second blocks of Independence Mall, a cafe on the second block of the Mall, and a bookstore and/or gift store at the Gateway Visitor Center. An informal picnic area would be designated within the existing landscape of the third block of Independence Mall. An area for staging festive events would be available on the second block of the Mall.

The city and private sector would improve the physical environment of the neighborhood so that the public would feel more comfortable visiting the city's many historic, cultural, and commercial attractions. Actions by the Greater Philadelphia Tourism Marketing Corporation would increase awareness of the many resources of Philadelphia. The Philadelphia Convention and Visitors Bureau would continue to provide delivery of pre-trip visitor information.

Basic orientation and information also would be available at the Declaration (Graft) House and within a small portion of the existing visitor center at Third and Chestnut Streets. To better serve

the public's information needs, the park would place unstaffed orientation kiosks in other high traffic areas.

Interpretive Themes

Independence National Historical Park would continue to focus its interpretive programs and services on the founding of the nation from 1775 to 1800, using five key themes that tell the story of Independence:

- Independence Hall and related structures as physical reminders of the epic struggle for freedom and self-government that underlie the founding of the United States and modern democratic governments worldwide
- the evolution of the American idea of democracy as expressed in the Declaration of Independence and the United States Constitution
- Benjamin Franklin, the quintessential founding father, whose life, contributions and accomplishments speak to the best of the American character
- 18th century Philadelphia, the political, economic, and cultural center of colonial America, whose central location and founding Quaker spirit of tolerance and freedom made it the logical birthplace for the new nation
- the Liberty Bell, an international symbol of liberty that, like our democracy, is fragile and imperfect, but endures

Please refer to the *Draft General Management Plan / Environmental Impact Statement*, pages 16-23, for a complete description of the park's interpretive themes.

Interpretive Approach

These stories would continue to be told primarily by the park, which would strengthen its core interpretive and educational programs. Interpretive rangers would use the park's historic core — principally the blocks between Third and Sixth Streets and Market and Walnut Streets — as the places where the stories would be told.

The northern two blocks of Independence Mall would carry the story of independence to current times by serving as the site for large First Amendment activities, special events, exhibits, and participatory learning. The Mall would be the site for two proposed educational institutions — the Independence Park Institute and the National Constitution Center — that would develop programs and exhibits to add to the park's stories and link them to the larger community.

The Independence Park Institute, a new self-supporting, cooperatively developed and operated education center, would sponsor public programs designed to inspire intellectual and emotional connections with the park's interpretive themes. Working with neighboring academic, historical and multicultural institutions, the institute would expand the methods, scope, and availability of interpretation. Special attention would be given to exhibits, classes, and conferences that explore the nation's cultural diversity.

The National Constitution Center, privately developed and operated, would house permanent and changing exhibits, programs, and media productions on the Constitution. These would interpret the ways in which the Constitution has shaped the path of the nation since 1800 and would enhance visitors' understanding of the meaning of the Constitution.

The park would work with partners to provide guided and self-guided tours, special events, and programs for children and adults that would invite visitors to explore their interests. These would take place in the proposed Independence Park Institute and in sites throughout the park and Old Philadelphia District, which includes the area from Eighth Street to the Delaware River between South Street and I-676.

OPERATIONS AND ADMINISTRATION

Management Options for New Development

All facilities called for in the proposed action would be owned by the National Park Service. Six possible options are available to manage these facilities — a range that reflects the tightly interdependent and mutually beneficial partnerships integral to this alternative. The options include action by the National Park Service, local government, a concessioner, a nonprofit organization, a cooperating association, or a legislated commission.

The Independence Park Institute would be operated through a cooperative agreement with a nonprofit organization, as would the National Constitution Center. The Gateway Visitor Center could be administered by or in partnership with a newly created nonprofit governing entity, on the board of which partners with a direct interest in the center's operations would be represented. If appropriate, the National Park Service could have a representative on the board. Such an inclusive board would respond to the park's intention to provide visitors with meaningful educational and logistical orientation not only in the park but in the city and region beyond.

The range of opportunities and limitations for governance and operation of this facility would be described in a cooperative agreement between the National Park Service and any relevant partner. Also, and to the extent that the partnerships necessary to the new developments require, special legislation could be necessary to authorize their anticipated broad range of activities.

Concessions

The proposed action calls for a substantial amount of new development in the second block of Independence Mall, including the Gateway Visitor Center, the Independence Park Institute, and the National Constitution Center. A major public open space would link them and serve as the primary arrival point to the park as well as the primary site for the special events so important to the park. The dramatically increased urban density envisioned for this block and the associated concentration of visitors and daily users indicates that food service should be provided on this block to satisfy visitor convenience and needs. Food service would add vitality to the Mall, contribute to reweaving the Mall into the surrounding urban fabric, and make private investment in facility development more attractive. As with the management options, to the extent that the partnerships necessary to new development require, special legislation could be necessary to authorize their anticipated broad range of activities.

Facilities

Most of the park's administrative offices would be relocated to and consolidated at the Merchants' Exchange Building. Additional space for vehicle storage, visitor protection equipment, and bulk storage to augment the undersized facility at Fifth and Manning Streets would be provided within or in conjunction with the National Constitution Center building. The existing Third Street visitor center would be rehabilitated to house curation activities and park museum storage and study collections. Part of the collection would be on public display. A small orientation and information center also would remain in that building.

Staffing

Under this alternative, additional park staff may be necessary, contingent on further development of Gateway Visitor Center facilities and park programming. A detailed staffing analysis would be undertaken at the time of implementation to determine specific requirements.

It is envisioned that the Gateway Visitor Center would be owned by the National Park Service but operated by a not-for-profit, third-party entity that would work with the National Park Service in operating the facility. The majority of the funding associated with the operation of this facility and the personnel necessary to staff it would be provided by the various partners associated with this third-party entity.

Partnerships and Cooperative Agreements

The park would seek a range of partnerships with organizations that share its vision, mission, and common goals, which would offer a number of advantages and opportunities. The park would welcome those proposals that promise to improve visitors' experiences while protecting park resources.

The park would work more closely with agencies, universities, and groups on a variety of joint actions to improve the visitor experience. The Friends of Independence National Historical Park would take the lead on the Independence Park Institute. Other cooperators, in association with the National Park Service, would initiate such new facilities as the Gateway Visitor Center, redevelopment of the second block of Independence Mall, and the National Constitution Center. The park would look to area historical and educational institutions and local government to advance such initiatives as developing a comprehensive interpretive plan for the Old Philadelphia District, inventive educational programs in addition to those that the park provides, and evening events.

The park would work with the city in implementing coordinated initiatives within the park and historic area to improve accessibility and to resolve traffic congestion and parking problems created by the mixture of tour and school buses, city buses, trucks and autos, rubber-wheeled trolleys, carriages, and pedestrians.

These and other partnerships would be evaluated according to their potential to improve the visitor experience and resource protection in the park. Partnerships also could be developed to support programming.

Existing legislatively mandated partnerships and subsequent cooperative agreements would continue to be honored and extended, modified, or concluded on a case-by-case basis as conditions warrant.

Circulation

Most visitors travel to the park by auto, tour bus, or school bus, and most of these vehicles arrive at the Sixth Street exit of I-676. In the proposed action the current serious impact of visitor traffic in the park and historic district would be reduced by a new system of handling vehicles closer to this point of arrival.

More than 40% of park visitors arrive on tour and school buses, and the number is growing. Buses would drop off and pick up passengers at a sheltered area on the second block of Independence Mall before moving on to parking at city-designated remote locations beyond the Old Philadelphia District. The bus area is intended to be a generator of activity rather than a barrier to pedestrian use of the block, and ultimate decisions about its specific location on this block would consider this goal. Additional study by the Philadelphia Parking Authority and the National Park Service is underway to determine the relative feasibility of a location at the north end of the block running east-west or parallel to Sixth Street running north-south. Underground or at-grade siting for this function is also being considered.

The city would ensure that tour and school bus parking would no longer be permitted on city streets in the historic area.

Parking for autos would continue to be available in the underground parking garage beneath the second block of Independence Mall. The garage would have to be renovated. The second block location of the garage and the second block site of the planned bus area would encourage arriving visitors to begin their visits at the Gateway Visitor Center, placing them literally at the center of things. Visitors could walk south to the Liberty Bell and Independence Hall, north to the National Constitution Center, or east or west to the dozens of historic, cultural, and entertainment sites in the surrounding neighborhoods. Redesign of Independence Mall would direct pedestrians to the corners of each block, reducing hazardous midblock crossings on Arch and Market Streets.

Visitors who prefer to ride rather than walk to sites beyond the park would have a number of choices. The park is very well served by public transportation, including a Southeastern Pennsylvania Transportation Authority (SEPTA) subway station stop at Fifth and Market Streets, and by several bus routes. SEPTA also is reconsidering routes and modes for providing shuttles that would link the park to sites as close as Penn's Landing and as far as the Philadelphia Zoo. The system would use restored historic trolleys. The city would be requested to relocate the designated standing area for commercially operated rubber-wheeled trolleys away from the 500 block of Market Street and to move the standing area for commercially operated horse-drawn carriages away from the 500 block of Chestnut Street. New locations for standing areas should be as close as possible to the new Gateway Visitor Center while not interfering with the new traffic patterns necessary to handle tourist-related automobiles and buses.

The National Park Service proposes that the city close the 500 block of Chestnut Street to vehicles in order to protect Independence Hall and to allow visitors to walk between Independence Hall and the Liberty Bell without the threat of moving traffic. This would necessitate rerouting eastbound Chestnut Street traffic north to Market Street via Seventh or Sixth Streets. From Market

Street eastbound traffic could turn left on Fifth Street and continue east on Race Street or return to Chestnut Street on Fourth, Second, or Front Streets.

To enable closure of the block, eight SEPTA bus routes that travel on the 500 block of Chestnut Street would be rerouted north on Seventh or Sixth Streets and east on Market Street. Routes that normally terminate at Sixth or Fifth Streets would be rerouted north on Fifth Street, west on Arch Street, south on Sixth Street, and westbound on Market Street or Walnut Street. Through routes that normally use Chestnut Street could continue east on Market Street and use Fourth, Second, or Front Streets to return to Chestnut Street.

The park would work with SEPTA to eliminate transit bus layover areas from sensitive locations on city streets in and adjacent to the park.

SITE-SPECIFIC ACTIONS

Please refer to the map of the park (and corresponding numbers) for the general locations of these sites.

Independence Mall would become the primary gateway to the park, city, and surrounding region and would have the most visitor activity. On its three blocks visitors would find a rich complement of places to see and things to do.

On the second block of the Mall, a **Gateway Visitor Center** (1) for orientation to the park, city, and region would be located on Market Street. The building would have a significant presence on the street. More detailed planning for the block also would attempt to accommodate views from the center of the second block south to Independence Hall as well as views from the south into the block. New views of Independence Hall would be incorporated from various points on the first block and from the southern end of the second block of the Mall.

The **Independence Park Institute** (2), adjacent to the Gateway Visitor Center, would offer a full palette of educational and cultural heritage programs.

Commemoration of Judge Edwin O. Lewis (3) would be provided by a new feature in the Gateway Visitor Center. It would honor the distinguished citizen who led the effort to establish Independence National Historical Park. The entire second block of Independence Mall would continue to be called the Judge Lewis Quadrangle.

A privately developed **National Constitution Center** (4) would provide exhibits, programs, and activities focusing on the impact of the United States Constitution on the nation. A Constitution Memorial, with design elements interpreting the significance of the United States Constitution and Bill of Rights, would be developed by the National Constitution Center. Both the center and the Constitution Memorial would be developed in conjunction with the National Park Service. If a larger space is required by the National Constitution Center, the facility could be located on the third block of the Mall.

A new grassy outdoor **public space** (5) would accommodate the growing number of groups seeking to use the park for demonstrations, festivals, and other large events. The overall design would provide a pleasant environment for passive recreation. Restrooms and seating areas would adjoin the area.

Visitor enjoyment of the **Free Quaker Meeting House** (6) would be improved through better access and identification from the interior of the Mall to the building.

The **underground parking garage** (7) would continue to be leased to the Philadelphia Parking Authority, which would rehabilitate and improve it.

A sheltered **dropoff and pickup area** for tour and school buses (8) would provide an amenable and easily identifiable spot for arrivals and departures. Bus parking would be located outside the historic area.

A modest **maintenance area** (9) for storage of equipment and supplies would be built in or in conjunction with the National Constitution Center.

The first block of the Mall would remain essentially the same, with its central open space flanked by allees of trees. The possibility of new locations for some elements would allow a reevaluation of sight lines and circulation. That process would take place whenever funding became likely, and the public would be kept informed.

Options for the **Liberty Bell Pavilion** (10) include enlarging the existing building or demolishing it and constructing a new building closer to the center of the block. Either option would provide better interpretation and protection of the Liberty Bell. Sites both on and off axis with Independence Hall would be considered.

An **area for small First Amendment rights events** (11) accommodating up to 250 people would be located east or west of a Liberty Bell Pavilion. The location would provide proximity to and excellent views of the Liberty Bell and Independence Hall and also would help to avoid interference with daily visitation.

The existing restrooms on the northeast and northwest corners of the block would be demolished to allow better sight lines from the northern corners of the block to Independence Hall. **New restrooms** (12) would be provided in freestanding locations on the terraces and would serve users of this block as well as visitors to Independence Hall and Independence Square, where restrooms cannot be added.

The National Park Service requests that the city close the **500 block of Chestnut Street** (between Fifth and Sixth Streets) (13) to all vehicular traffic for the safety of visitors crossing between the Liberty Bell and Independence Hall and for protection of Independence Hall itself.

Independence Hall (14) and related buildings are being rehabilitated. The west wing will host a new exhibit displaying the Syng inkstand and the park's copies of the Declaration of Independence, the Articles of Confederation, and the United States Constitution.

The third block of the Mall would remain unchanged for the foreseeable future. If the second block of the Mall is redeveloped as envisioned, the dynamics of use of the third block are likely to change, and its treatment would be reconsidered.

A **gateway element** (15), including signs and architectural, sculptural, and/or landscape features, would be added to the northwest sector of the third block to signal arriving visitors that they have entered the park and historic area.

Within the existing landscape, an informal **picnic area** (16) would be designated, primarily to serve families and the thousands of schoolchildren who visit every year.

If the National Constitution Center requires a larger space than is available on the second block, the facility could be located on the third block of the Mall.

The **Declaration (Graff) House's** (17) first floor would become an information and orientation center. The theater would be converted to one story in height and the second floor used for expanded exhibits.

Washington Square (18) will be transferred to the National Park Service when it is rehabilitated by the Fairmount Park Commission and the American Revolution Patriots' Fund in accordance with a 1991 agreement. In addition to its current uses as a neighborhood park and memorial to the Unknown Soldier of the American Revolution, the square would become a place for interpretation of the 18th century African-American experience.

The **Fifth Street maintenance building** (19) will remain as it is.

The **Second Bank** (20) would be rehabilitated. Its first floor would continue to house the portrait gallery, and the second floor would continue to be used for administrative offices.

The **Franklin Court underground museum** (21) would be rehabilitated with new exhibits, programs, and improved exterior signs.

Pemberton House (22) contains one of the park's bookstores. The Army-Navy Museum and Marine Corps Museum and Memorial have been consolidated in the adjacent New Hall Military Museum.

The first floor of the **First Bank** (23) would house a permanent exhibit on the financial foundations of the new republic and other changing exhibits while the second floor would be occupied by friends-of-the-park organizations.

The existing **Third Street visitor center** (24) would be redesigned to house the park's architectural study collection and changing exhibits. The building also would be used for curatorial activities and visible storage of park collections. Part of the building would continue to be used for visitor orientation.

The **Merchants Exchange** (25) would become park administrative headquarters.

The **park's current headquarters** at 313 Walnut Street (26) would be rehabilitated for administrative uses or historic leasing when current uses are relocated to the Merchant's Exchange.

City Tavern (27) would continue as a restaurant, providing an 18th century dining experience.

The **Second Street parking garage** (28), owned by the National Park Service and leased to the Philadelphia Parking Authority, will return to the park's jurisdiction in 2009. Its operational management will be reevaluated at that time.

The **Thomas Bond House** (29) will continue as a bed-and-breakfast establishment.

Signs would be added at **Welcome Park** (30) to help visitors find their way from the parking garage to the core of the park.

The **chilled water plant** (31) will serve buildings in the park south of Market Street. Construction will begin in spring 1997.

The **Deshler-Morris House** in Germantown (not on the map) will continue to be managed by the Deshler-Morris House Committee, Inc. The adjacent Brighthurst House would include additional park housing and a staging area for tours of Deshler-Morris.

COST ESTIMATES

Class C cost estimates are conceptual and based on general costs for similar construction. They do not reflect a fully defined scope of work and are intended to be used only for a general comparison of alternatives. More refined estimates are developed later during the preliminary design phase (class B) and after construction drawings and specifications have been developed (class A).

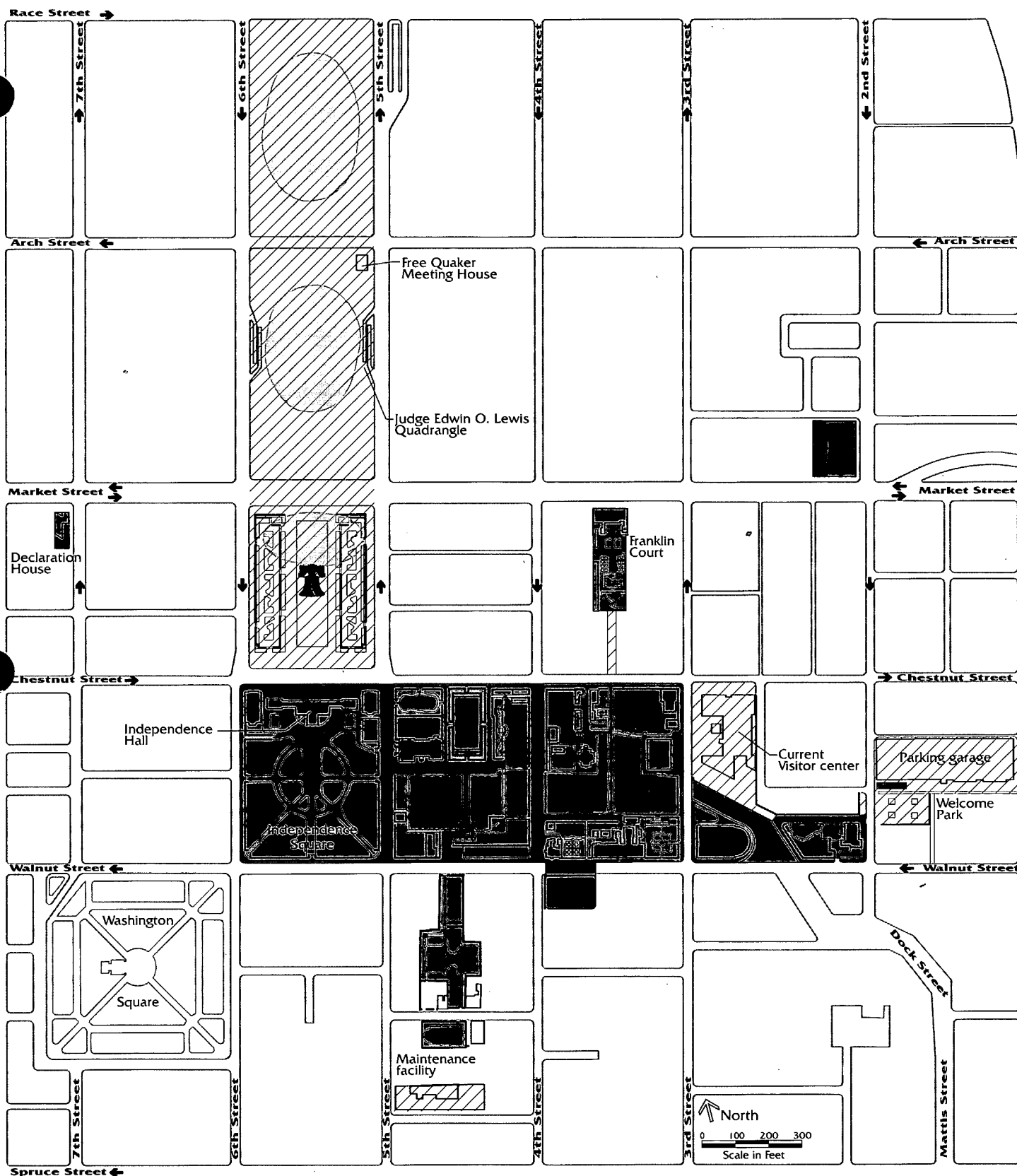
It is anticipated that operational and cyclic maintenance repair costs would for the most part remain unchanged. Any proposed new structures on Independence Mall would be funded by park partners or private donations rather than through federal appropriations. With the exception of a new Liberty Bell Pavilion, any operational or cyclic maintenance costs for any new structures on Independence Mall (e.g., National Constitution Center, Independence Park Institute, and Gateway Visitor Center) would be the responsibility of the park partner. It is assumed that there would be little change in the operational and cyclic maintenance costs for a new Liberty Bell Pavilion over the existing structure.

Detailed design plans would be produced after the *General Management Plan* is finalized. At that time any additional operational costs associated with any redesign of Independence Mall, particularly the second block, would be identified.

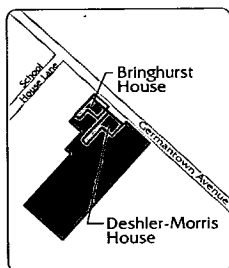
TABLE 1: PROPOSED ACTION — CLASS C COST ESTIMATE

Development Item	Quantity	Gross Construction Costs	Advance and Project Planning Costs	Total Project Costs
Kiosks	4	\$57,600	\$11,000	\$68,600
Directional/information signs	20	10,900	2,100	13,000
Site circulation improvements		536,000	103,000	639,000
Graff House remodeling — first floor, theater, second floor	4,800 sf	628,800	120,000	748,800
First Bank — first floor conversion to exhibit space	7,100 sf	930,100	177,500	1,107,600
Rehabilitate visitor center for adaptive reuse; display, curatorial activities, museum storage, study collections, and visitor orientation	19,647 sf	2,573,800	491,200	3,064,900
313-319 Walnut rehabilitate for adaptive reuse	25,845 sf	3,385,700	646,100	4,031,800
First block of Independence Mall:				
Liberty Bell Pavilion (enlarged)	5,576 sf	\$1,032,000	\$197,000	\$1,229,000
Liberty Bell Pavilion (remove and replace)	8,000 sf	3,516,000	671,000	4,187,000
Demolition of existing restrooms, construction of new restrooms		948,000	181,000	1,129,500
Paving (brick)	2,500 sf	98,300	18,800	117,000
Second Block of Independence Mall:				
Demolition/clearing of the second block — keep Free Quaker Meeting House	254,000 sf	\$1,663,700	\$317,500	\$1,981,200
Dropoff/pickup area for gateway visitor center	40,700 sf	373,200	71,200	444,400
Lawn (special events) and surrounding seating areas and landscaping	180,000 sf	742,300	180,000	922,300
New Gateway Visitor Center ^a	30,000 sf	11,043,300	2,107,500	13,150,800
	60,000 sf	22,086,600	4,215,000	26,301,600
New Independence Park Institute ^a	10,000 sf	2,292,500	437,500	2,730,000
Cafe	3,500 sf	848,200	161,900	1,010,100
Underground parking ^b	650 cars			
Second or Third Block:				
National Constitution Center ^a	Undetermined			
Multipurpose area	9,000 sf	\$1,650,600	\$315,000	\$1,965,600
Third Block of Independence Mall:				
Gateway element, north end of third block ^c				
TOTAL		\$28,815,000	\$5,538,300	\$34,353,600
		to \$46,342,300	to \$8,119,800	to \$50,462,400

^a To be funded by park partners or private donation.^b Costs associated with rehabilitation will be borne by the Philadelphia Parking Authority.^c Form undetermined — costs cannot be determined at this time.



- Cultural zone
- Park development zone
- Park development special events zone (approximate location)



Management Zoning Proposed Action

Abbreviated Final General Management
Plan / Environmental Impact Statement

Independence National Historical Park

U. S. Department of the Interior/National Park Service
391/20,076B/January 97/DSC



ON MICROFILM

ENVIRONMENTAL CONSEQUENCES

INTRODUCTION

Independence National Historical Park is completely interwoven with the city. This condition mutually enriches the park and the city, yet creates challenges in the management of a park that is sometimes indistinguishable from its surroundings.

The *Draft General Management Plan / Environmental Impact Statement* for the park contains 50 pages of detailed description of the environment that would be affected by any of the proposed actions in Independence National Historical Park. The description includes the cultural and natural resources of the area, the features supporting the visitor experience, the area's socioeconomic environment, current patterns of traffic and transportation, park use and development, and the operations and administration of the park.

The description of the affected environment in the draft will not be duplicated here but is incorporated by reference. Copies of the draft can be obtained by visiting the park's Web site at <http://www/libertynet.org/~inhp> or by contacting the superintendent at the address shown on page i.

IMPACTS OF THE PROPOSED ACTION

The proposed action and the alternatives presented in the *Draft General Management Plan / Environmental Impact Statement* are general in nature and establish broad management guidelines and approximate locations for proposed development. The general nature of the alternatives, in addition to uncertainty about what actions might be taken by other public and private agencies and organizations, requires that the analysis of the impacts of the alternatives also be general. The National Park Service has made reasonable projections of likely impacts. The following information is presented to allow comparative evaluation of the potential impacts of the proposed action against the six alternatives presented in the draft.

Impacts on Visual Resources

There would be little or no visual impact on historic landscapes because the historic core of the park would remain unchanged; all proposed development is recommended for Independence Mall. The Mall was determined not to meet national register criteria for significance because of its relatively recent construction. It does not meet established criteria as a commemorative property.

The key concept of the 1952 master plan for Independence Mall was the establishment of a three-block-long vista between Independence Hall and the arrival plaza of the Benjamin Franklin Bridge. Since completion of the Mall, there has been controversy over the effectiveness of the vista, given the diminutive size of Independence Hall, its backdrop of high-rise towers, heavy traffic on the streets crossing the Mall, the bridge plaza's reconstruction to accommodate interstate highway ramps, and the half-mile length of the Mall. The view south to Independence Hall from the second block was impeded by the 1975 addition of the Liberty Bell Pavilion on the first block. The apparent vista could be further abrogated by the construction of various facilities on the second block of the Mall, although efforts would be made to minimize that possibility. New views

and vistas to Independence Hall would be established through design from various points on the first block and the southern end of the second block of the Mall.

New development on the first block of Independence Mall would be assessed for size, scale, massing, and use of materials in order to be sympathetic to Independence Hall and other historic buildings in the park and historic area.

Impacts on Cultural Resources

The proposed action would provide heightened protection for Independence Hall if the 500 block of Chestnut Street were closed to traffic.

Seven national register historic districts surround Independence National Historical Park. There are a number of properties listed individually on the national register, as well as national historic landmarks in the surrounding area. If visitation increases as a result of redevelopment of Independence Mall, and particularly if the average length of stay increases, it is likely that visitation in the neighboring historic districts would increase as well. Increased levels of visitation and lengths of stay would benefit neighboring historic and cultural sites that depend on visitation for economic support or as part of an educational outreach mission.

Redevelopment of the Mall would increase visual access to the adjacent historical properties due to removal of some perimeter walls that limit views from the interior of the Mall. Better control of tour and school buses and prevention of idling would reduce emissions and vibrations that contribute to the deterioration of historic buildings.

The Free Quaker Meeting House is the only structure on Independence Mall listed on the National Register of Historic Places. Because the original context of the building is gone, redesign of the second block offers an opportunity to increase the visibility of the site, respect the scale of the building, and ensure that the building is better integrated with the rest of the block. There would be no other long-term effect on the building.

New development of structures on the first, second, or third blocks of Independence Mall could result in damage to presently unknown archeological resources.

The consolidation of park collections into the Third Street visitor center would increase their protection by providing greater safety and environmental controls. Construction of a new Liberty Bell Pavilion would result in better protection, interpretation, and preservation of the Liberty Bell.

The city and the park would cooperate to minimize the effects of tourist-related bus and automobile traffic, particularly from autos searching for on-street parking. The historic districts are attractions in themselves, and there could be some increases in vehicular traffic if visitors decline to walk or to use shuttles in favor of personal automobiles or tour buses. Increased visitation also could indirectly result in increased vandalism, littering, and other negative impacts.

Redevelopment of the Mall could increase visitation to other park buildings and sites. Funds would be sought to evaluate the carrying capacities of park structures and sites in accordance with section 604 of Public Law 95-625 to ensure that damage to park resources does not result.

The cumulative effect of this alternative would be to improve the protection and preservation of cultural resources. The risk of disturbance of unknown archeological resources would be balanced against the gains made for artifact preservation, better preservation of park structures, better control of visitor-related vehicular traffic, preservation efforts beyond park boundaries, and the lack of impacts on historic architecture.

Impacts on Natural Resources

Because Independence National Historical Park contains no natural landscapes, resident populations of threatened, endangered, or candidate species, breeding or critical habitat for endangered, threatened, or candidate species, or wetlands or watercourses, air quality is the only natural resource that would be substantially affected by the proposed action.

As described in the *Draft General Management Plan / Environmental Impact Statement*, regional levels of diesel exhaust, sulfur dioxide, ozone, nitrogen oxides, and particulate matter cause breathing problems and deterioration of historic structures. Although the level of increase in visitation that could result from redevelopment of the Mall cannot be predicted, any increase in the number of buses and automobiles could exacerbate air pollution.

This alternative, however, mitigates the increase in several ways. It would designate clearly the Mall garage as the location for automobile parking, intercepting automobiles as they arrive and discouraging drivers from circulating throughout the historic area while they search for parking. It would promote walking and the use of public transportation and city shuttles for transport around Center City. It would provide a short-term dropoff and pickup zone for school and tour buses, preventing idling on city streets in the historic area. (Designation of a remote parking area for buses, however, could transfer the idling problem to that area if regulations are not enforced.)

The establishment of a paved area for First Amendment rights events on the first block of Independence Mall would result in removal of some trees and lawn. Redevelopment of the second block of Independence Mall would add trees and lawn.

There would be no cumulative adverse effect on natural resources as a result of this alternative.

Impacts on the Visitor Experience

The effects of this alternative on the typical experience of a visitor would be very positive.

The addition of elements denoting Independence Mall as the gateway to the park and historic area would promote a sense of arrival and allow recognition that one has reached a destination. New signs and clarification of the circulation pattern into the parking garage, to the Gateway Visitor Center, and then to destinations of one's choice would eliminate the confusion often experienced by current visitors. This new ease of navigating, combined with greatly enhanced orientation to be offered at the new Gateway Visitor Center, would allow visitors to make the best use of available time and allow more opportunities to discover and visit historical, cultural, and entertainment resources in the park and beyond.

The interpretive programs and exhibits to be offered at the Gateway Visitor Center would allow visitors to understand the historical and geographic context for the park and its resources and to understand the interconnections with the surrounding city and region.

The Independence Park Institute and the National Constitution Center would greatly expand opportunities for education and enlightenment, providing facilities and programs that currently are not offered. Both organizations would attempt to promote informed visitation among school groups and among diverse populations who currently are not part of the typical park audience, thereby reaching many more people with the messages and themes of the park.

A new paved space on the first block of Independence Mall and the open space on the second block would allow First Amendment rights events and festive events to be well accommodated in prominent places. Services that currently are not available, including water, restrooms, night lighting, and electrical power, would ease the staging of events. The availability of these spaces and facilities would reduce conflicts between large special events and everyday use of the park by individuals.

The availability of food service on the second block of the Mall and of picnic areas on the Mall would provide convenience to visitors.

Redevelopment of the Mall would provide the opportunity to make all areas accessible and welcoming to people with disabilities. The dangerous practice of crossing Market and Arch Streets at midblock would be reduced by establishing new circulation patterns that lead pedestrians to corner crossings. The danger of uncontrolled pedestrian crossings of Chestnut Street would be lessened by the recommended closing of the street to vehicular traffic between Fifth and Sixth Streets.

In general, by redeveloping the Mall with more welcoming, functional, and comfortable spaces, including new visitor service functions and through the addition of educational and interpretive programs, visitor and community use would be expanded and would become more educational and enjoyable.

Impacts on the Socioeconomic Environment

The effects of this alternative on the surrounding neighborhoods and on the larger area would be positive.

This alternative has the potential to affect the socioeconomic environment in both the short and long term. Short-term economic impacts resulting from the proposed action would be principally a consequence of construction activity associated with the redevelopment of the Mall. The development costs to implement this alternative are estimated to be between \$30 million and \$50 million (not including the costs of building the privately financed National Constitution Center or renovating the underground parking garage, which will be financed by the Philadelphia Parking Authority). For comparison purposes, estimates of development costs for the six alternatives presented in the *Draft General Management Plan / Environmental Impact Statement* range from \$7 million to \$103 million.

Along with the direct economic benefits, indirect benefits are estimated to range from \$31 million to \$44 million. These expenditures would support approximately 800 to 1,100 jobs during the time of construction and development.

The establishment of new visitor facilities on Independence Mall, such as the Gateway Visitor Center, National Constitution Center, Independence Park Institute, and food service; the increase in the potential number of special events; and the tourism marketing initiatives to be spearheaded by the Greater Philadelphia Tourism Marketing Corporation would increase the number of people visiting the park, city, and region and the length of their visits. Better information and orientation of visitors about resources beyond park boundaries would result in increases in visitation to other cultural, historic, retail, and entertainment resources in the area. More visitation, longer stays, and better information would help to increase the amount of spending by tourists. Additional positive economic impacts could include increased employment in facilities that serve tourists, increased tax revenues, and an increased value in nearby properties.

Area residents also would benefit from the provision of more usable and accessible civic space, more educational facilities, and better interconnections among the park and surrounding areas.

No long-term effects on the area's population base or housing stock are anticipated. Residential areas on the west, east, and south are buffered from Independence Mall by intervening land uses. No increased demand for community educational or recreational services would be expected. The Independence Park Institute and the National Constitution Center would substantially augment the area's educational facilities.

Impacts on Traffic and Transportation

The National Park Service recommends the removal of vehicular traffic from the 500 block of Chestnut Street. Closure of this block would have both positive and adverse effects.

Closing the block would eliminate conflicts among vehicles and pedestrians in front of Independence Hall, significantly improving pedestrian safety and the visitor experience. There would be a vehicle free zone for everyday events and activities that take place between the Liberty Bell and Independence Hall. Closure also would contribute to scenic values and the protection of Independence Hall itself.

Closure would result in less convenient access to and from adjacent properties, however. Properties on Chestnut Street between Fifth and Fourth Streets and on Fifth Street between Chestnut and Market Streets would be most affected.

Closure also would necessitate the rerouting of traffic that normally uses this block. With widening of Sixth and/or Seventh Streets, two-way traffic on Sixth Street between Chestnut and Market Streets, and selected intersection improvements, traffic impacts could be addressed. The traffic level of service could be improved at the intersection of Fifth and Market Streets, depending upon the level of intersection improvements and the routes selected for the diverted traffic.

Closure would result in minor traffic increases on Pine Street between Eighth and Fifth Streets and on Fifth Street between Pine and Chestnut Streets. Similarly, minor traffic increases are expected on Seventh Street north of Market Street at the southeast edge of the Chinatown neighborhood. It is anticipated that the impact of traffic diversions on the Society Hill and

Chinatown neighborhoods resulting from a closure of the 500 block of Chestnut Street would be minimal, however. Little or no effect is anticipated on traffic patterns in the core of Center City or in greater Philadelphia.

The impact of closure would be somewhat lessened by the location of the new visitor center and the associated underground parking garage close to the I-676 exit, resulting in the opportunity to intercept tourist traffic before it circulates through the district.

Some onstreet parking spaces would be eliminated on Fifth and Sixth Streets and on Seventh Street if traffic is diverted there, but this loss would be balanced by the availability of parking in the existing underground parking garage and other parking garages in the immediate area. In addition, the increased awareness of availability of the underground parking garage (provided through improved signs) would reduce tourist-related parking pressure in the adjacent area.

The removal of school and tour bus parking from public streets and provision of the short-term dropoff and pickup area near the visitor center would reduce congestion currently caused by bus traffic. If the dropoff area extends from Sixth to Fifth Streets, tour and school buses would be intercepted and redirected out of the historic district, and most of the current impact of bus traffic within the area would be eliminated. If it runs parallel to Sixth Street, tour and school buses would have to depart the area using Market Street or other historic area streets, providing fewer benefits than a Sixth to Fifth Streets location.

The impact of closure on eight public transit routes operated by SEPTA would result in increased operating costs because the diversion routes are longer than existing routes. There could be a loss in ridership (and revenue) because of the loss of through service on Chestnut Street east of Seventh Street. The city-sponsored 1987 *Transitway Management Study*, however, recommended relocating the Chestnut Street routes to Market Street, which has more than adequate capacity to accommodate additional buses at peak hour. The 1996 *Renewal Agenda for Off Broad East*, prepared by the Philadelphia City Planning Commission, also recommends redirecting buses off Chestnut Street, as well as replacing them with a quiet, low pollution shuttle service. All these factors would have to be considered by the city in weighing the decision to close the 500 block of Chestnut Street.

Between January and June 1996, the traffic, highway, and site engineering firm of Orth-Rodgers & Associates, Inc., of Philadelphia undertook traffic analysis to reassess the potential effects of the proposed action on the surrounding neighborhoods. A copy of that report is available upon request.

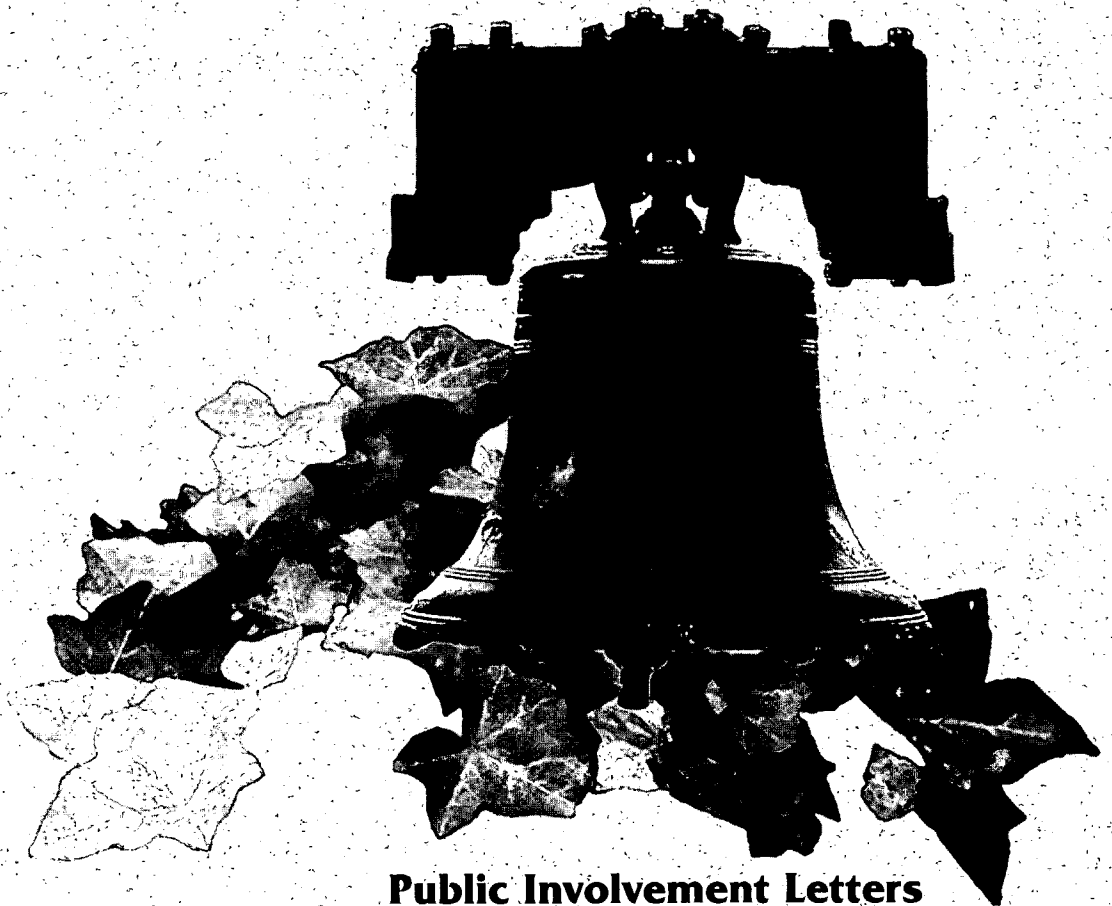
Impacts on Operations and Administration of Independence National Historical Park

The ability of the park to serve visitors would improve through availability of a new visitor center in a location most visitors would visit. Through operating partnerships and through the contribution of some outside funding for the operation of the Gateway Visitor Center, the ability of the park to orient visitors to resources in the city and region would improve.

Increases in visitation would result in increased demands for services (including interpretation, life safety, and maintenance) and more pressure on limited park resources. Adequate increases in the park's budget and staff would be necessary to accomplish the additional workload that would result.



Section 2



**Public Involvement Letters
Proposed Action
September 1996 - Newsletter**

SECTION 2 PUBLIC INVOLVEMENT LETTERS

Under the National Environmental Policy Act of 1969, the National Park Service is required to seek the comments of government agencies, organizations, and the public with regard to actions proposed by the agency. This is done through newsletters, public meetings, and public review of planning documents. All three methods were employed during development of the Independence National Historical Park *General Management Plan*.

During public review, written comments were provided to the National Park Service by federal, state, and city government agencies; by organizations; and by individuals. All the letters that were received regarding the plan are reproduced here in that order along with corresponding National Park Service responses. Not all comments required a response. Private addresses and phone numbers have been blacked out in the document to preserve the privacy of individual citizens.

COMMENTS

Received DSC-PM
OCT 20 1996

COMMITTEES
VETERANS AFFAIRS AND EMERGENCY
PREPAREDNESS
STATE GOVERNMENT

CAUCUSES
ITALIAN-AMERICAN CAUCUS
JAPANESE-AMERICAN CAUCUS

House of Representatives
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

October 15, 1996

Martha Atkins, Superintendent
Independence National Historic Park
313 Walnut Street
Philadelphia, PA 19106

Dear Superintendent:

My constituents of the Society Hill Civic Association have contacted me in reference to the proposed closing of Chestnut Street between 5th and 6th in connection with the renovation of the Park.

Because the historic area places a great increase in traffic on a daily basis in this residential neighborhood, it will be impossible for Pine Street to accommodate more vehicles. Certainly, the traffic engineers can find a better solution to the problem than the use of Pine Street, which is already over-crowded with the normal traffic, and emergency vehicles, taxis, and public transportation.


The aging infrastructure, especially stress on the road bad and the water and other lines, which lie beneath, present the potential for hundreds of thousands of dollars in repairs to home-owners.

Will you please impress upon the Park Service that it is imperative that they find another solution.

Sincerely,
Marie Lederer
MARIE LEDERER
State Representative
175th District

ML:mla
cc: Society Hill Civic Association
Commissioner Lawrence Moy

RESPONSES


NATIONAL PARK SERVICE
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

NOV 9 7 1996

D18 (INDE)

Honorable Marie Lederer
State Representative
175th District
224 South Office Building
Harrisburg, Pennsylvania 17120

Dear Representative Lederer:

Thank you for your letter regarding the concerns of your constituents about the proposed closure of the 500 block of Chestnut Street.

As part of the National Park Service's draft General Management Plan for Independence National Historical Park, we have proposed closing the block to protect Independence Hall from additional damage caused by vibration from moving traffic and from potential terrorist threats. The proposal also seeks to protect the hundreds of people - both visitors and residents - who jaywalk daily at this point, perhaps in the mistaken impression that it is safe to walk where one pleases in a park.


Anticipating the need to mitigate the traffic impacts that closure would cause, we contracted with a traffic engineer to study the potential impacts and propose solutions. The consultant found that 90% of Chestnut Street traffic would divert to Market Street, and not to Pine Street in Society Hill. In the summary, the consultant reported that:

Based on our analysis, the impact of traffic diversions on Society Hill and Chinatown resulting from a closure of the 500 block of Chestnut Street would be minimal. Impacts to Society Hill would be limited to an additional 20-30 peak hour vehicles on Pine Street between 8th and 5th Streets, and on 5th Street between Pine and Chestnut Streets. Impacts to Chinatown would be limited to an additional 50 peak hour vehicles on 7th Street, a non-residential street on the eastern edge of the community.

COMMENTS

RESPONSES

2
The decision to close Chestnut Street ultimately rests with the City of Philadelphia. We hope that the city will work with us to find a solution that serves and protects all interests.

Sincerely,

Martin B. Atkins
Superintendent

COMMENTS



Commonwealth of Pennsylvania
 Pennsylvania Historical and Museum Commission
 Bureau for Historic Preservation
 313 Walnut Street
 Harrisburg, Pennsylvania 17106-1026

September 23, 1996

Martha Aikens, Superintendent
 Independence National Park
 313 Walnut Street
 Philadelphia, PA 19108

Dear Ms. Aikens:

The Pennsylvania Historical and Museum Commission appreciates the opportunity to comment on the revised Preferred Alternative for the General Management Plan for Independence National Historic Park. This most recent proposal presents a stronger vision for a revitalized Mall and a quality experience for the site's many visitors. Our specific comments on the elements of the proposed plan are as follows:

1) Visitors Center

We strongly support the construction of a major visitor center on the second block of the Mall along the Market Street axis to serve the region as an entry point into historic Philadelphia. The new visitor center will utilize what is now essentially dead space on the Mall and will be a gesture to reestablishing a streetscape along a major thoroughfare. Incorporating the new Independence Park Institute into the center will be a plus and will assist in providing citizens with a high quality learning experience. As the point of introduction for many of the park visitors and the counterpoint to Independence Hall itself, the visitor center should make a statement and should be of high quality design.

We strongly favor a visitor center that will provide sufficient orientation to place the National Park in the context of both the city and the region. It should also inform visitors of the opportunities for enjoying the food, lodging and other attractions that will make their visit enjoyable. This can best be done through a partnership with other cultural and tourism organizations. The visitor center, by exhibits, film, interactive programs and informed staff, should provide a taste of the richness and diversity of the community.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
 Independence National Historical Park
 511-513 Walnut Street
 Philadelphia, PA 19106

NOV 07 1996

D18 (IND2)

Dr. Brent D. Glass
 Executive Director
 Pennsylvania Historical and Museum Commission
 PO Box 1026
 Harrisburg, Pennsylvania 17108

Dear Brent:

Thank you for your letter analyzing the points of the revised General Management Plan Preferred Alternative for Independence National Historic Park. I am very pleased that the Commonwealth and the National Park Service are in agreement on this very important plan.

We deeply appreciate the attention and support you and your staff have given to the planning process and its results. We look forward to continuing our collegial and productive relationship as the plans for the mall move forward toward implementation.

Sincerely,

Martha B. Aikens
 Martha B. Aikens
 Superintendent

COMMENTS

RESPONSES

Page 2
September 23, 1996
Ms. Atkens

2) Visitor Access

We also applauded the well thought out access to the site with the rehabilitation and full utilization of the underground parking garage in the second block and with a logical reception system for the many bus groups visiting the sites. The visitors will progress from the visitor center, to the Liberty Bell, and on to Independence Hall itself in a logical manner that will also provide a sense of pacing and drama.

3) Mall Redevelopment

Overall, we are in favor of the allocation of space and uses on the Mall. In particular, the proposal for the second block. The third block is still a marginal area. However, the development of a gateway on the Race Street side will be very helpful. Good signage and other directional aids are critical to manage the car and bus traffic to the site.

The retention of the Free Quaker Meeting House on its current location, along with better visitor access, is a good approach. It is also important to continue to honor the memory of Judge Edwin O. Lewis both in the naming of the second quadrangle and in some other tangible fashion.

4) Historic Properties

This plan assigns clear functions for the historic structures within the park boundaries which is critical for the continued maintenance. In addition, the resource should be interpreted in a manner that places them in the context of eighteenth century Philadelphia.

5) Visitor Experience

The physical changes discussed above will have a positive impact on the visitor's arrival, orientation, approach and appreciation of the historic site and city. Equally important are the intangible elements conveyed by the interpretive themes and the delivery of the message.

A collaborative approach, working with partners such as the Friends of Independence Park, the Constitution Center and other historic and cultural organizations outlined in the proposed plan, is essential to the success of this effort. The Philadelphia region is a treasure to be shared with the world. In partnership, the goal of putting the spotlight on these resources can be achieved.

RESPONSES

COMMENTS

Page 3
September 23, 1996
Ms. Alkens

We look forward to this plan moving forward into reality and stand ready to assist the National Park Service and other partners in this important endeavor.

Sincerely,

Brent D. Glass

Brent D. Glass

cc: Deirdre Gibson/NPS
Marie Rust/Regional Director/NPS

BDG/bb/fta

COMMENTS



CITY OF PHILADELPHIA
 OFFICE OF THE MAYOR
 ROOM 215 CITY HALL
 PHILADELPHIA, PENNSYLVANIA 19107-3288
 (215) 686-2116
 FAX (215) 686-2170

EDWARD G. RENDELL
 MAYOR

October 3, 1996

Ms. Marie Rust
 Field Director, Mid Atlantic Region
 U.S. Department of the Interior
 National Park Service
 143 South Third Street
 Phila., PA 19106

Dear Ms. Rust:

At last week's Park Service public meetings, Karen Butler spoke on my behalf regarding the latest draft of the General Management Plan. With this letter, I would like to formally reiterate the City's position.

As you know, the relationship between the City of Philadelphia and the National Park Service is governed by a 1951 Cooperation Agreement which guarantees Park Service access to City-owned artifacts and buildings such as Independence Hall and the Liberty Bell, so that it may use and occupy them "exclusively for preservation, interpretation and curatorial purposes." The agreement also states that "any work of restoration or any major alterations or repairs to any of the buildings shall not be undertaken until the plans for such work shall have been mutually agreed upon."

Accordingly, the Director of the City Planning Commission, Barbara Kaplan, her staff, and Karen Butler, from my office, have been representing the City's interests on the GMP Steering Committee since 1993. It is no secret that relations between the City and the Park Service have been strained over many aspects of this GMP. This most recent draft, however, moves much closer to addressing the City's concerns about the redevelopment of the Mall and the City's potential for economic development through tourism.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
 Northeast Field Area
 U. S. Customs House
 220 Chestnut Street
 Philadelphia, PA 19106
 (215) 261-1850
 OCT 15 1996

BY AIR MAIL TO

DIR(NEFA/S&P-B)

Mayor Edwin G. Rendell
 Room 215, City Hall
 Philadelphia, PA 19107

Dear Mayor Rendell:

Thank you for your letter describing the city's response to the revised preferred alternative for Independence National Historical Park. Superintendent Martha Aikens and our staff share in the delight that we have come to agreement with you on a plan for Independence Mall that meets so many of our goals.

Let us respond to the three concerns you outlined.

1.) The General Management Plan (GMP) is inherently flexible. The revised preferred alternative allows for the possibility that new information can alter preferences. We expect to receive the Philadelphia Parking Authority's report on the underground parking garage well before finalization of the GMP. In the meantime, the document expresses our criteria for the ultimate location of a dropoff.

2.) We regret that you have had to reconsider your earlier commitment to Director Roger Kennedy that the city would close the 500 block of Chestnut Street. Because we believe that closure is the most responsible position when considering the safety of visitors and the protection of Independence Hall, the final GMP will retain our recommendation that it be closed. We certainly recognize that authority for the street is yours alone. This being your decision, we hope to work with your staff on solutions that will meet your needs and also provide protection.

3.) We do, in fact, understand the legal and proprietary issues that would apply if we wished to develop the third block of the mall with commercial uses. As you know, it is a policy of the Department of the Interior and the National Park Service not to commercially develop national parks, and no compelling reason to violate that policy has yet been presented for Independence National Historical Park. Perhaps the results of the redevelopment of the second block will lead us all to new ways of thinking about the third block.

We could not agree more that it is now time to move ahead. We thank you and your outstanding staff for your continuing efforts and support in this important work.

Sincerely,

Joan Marmorek
 Marie Rust
 Field Director

cc: ~~William B. Jefferson, Superintendent, National Park Service~~

COMMENTS

RESPONSES

In terms of improvements to the core interpretive areas of the Park, we are particularly pleased that the Park Service has planned 1.) expanded gateway and orientation signage 2.) the expansion of Park Service interpretation to ground it in the context of 18th century Philadelphia 3.) additional programming to include an exhibit of the Park's architectural collection, the early history of banking and a visible and accessible presentation of the Park's copies of the Declaration, Articles of Confederation and U.S. Constitution 4.) new programming, addressing the early African American experience in Philadelphia 5.) updating the aging interactive components at Franklin Court and re-examining the Graff House for its potential as a visitor gateway from the west.

Which brings me to the most visible and controversial series of improvements outlined in the GMP: the revitalization of Independence Mall. In the past 3 years I have received hundreds of Mall plans, as has the Park Service. The proposals are from architects, planners, Senators, Park neighbors and children, and have run the gamut from a crayon sketch on loose-leaf, to letters with detailed drawings, to constructed architectural models. Having reviewed all these proposals, I can tell you there is no public shortage of opinion, creativity, plannerly advice, righteous indignation or love, for Philadelphia or the Park. Many of the proposals have sparked intense debate between the Park Service, the City and their new and very welcome partner, The Pew Charitable Trusts. Ultimately, however, one vision for the Mall has emerged and is outlined in the Preferred Alternative E-1. It is creatively flexible, practical and respectful and weighs visitor needs for access and orientation with the hard realities of financing such accommodation.

There are, however, three (3) major concerns the City has regarding Preferred Alternative E-1.

1.) That the plan and the partners who will implement it, maintain flexibility. This is particularly important since the final plan for the 2nd block is inextricably tied to the Philadelphia Parking Authority's decisions about the disposition of its underground garage at that site. Until Rina Cutler has completed and presented her evaluation of the garage's future and the costs involved, there can be no productive discussion of general traffic and parking issues, especially a mid-block bus drop-off.

2.) The second concern from the City's perspective, is the GMP recommendation to close the 500 block of Chestnut Street to all traffic. The City recognizes the security and safety issues prompting the recommendation and certainly supports clear pedestrian crossings and a more intimate streetscape. (In fact, creating a visible linkage system from the visitor center through a series of sites and attractions and clearly directing pedestrians across streets at safe crossing points like Boston's Freedom Trail, is a visitor amenity I would very much like to see.) The closing of Chestnut Street would, however, have such far-reaching consequences beyond the immediate historic area, that such a consideration is out of the question both practically and financially.

COMMENTS

RESPONSES

3.) Finally, the City has always felt that the 3rd block of the Mall is an enormous waste of space. We recommend that legal and proprietary issues regarding development of the block be explored now, so that when economic conditions change and an appropriate opportunity consistent with the overall Mall plan is presented (such as a medium-sized hotel,) that development can move forward quickly.

With the exception of those three (3) City concerns, Alternative E-1 is solid, practical and exciting and will, when complete, reclaim urban energy and connections along Market Street, encourage pedestrian traffic, and create synergy with the surrounding region. The City, for example, has long championed a more dramatic and inspiring context for the Liberty Bell. The proposed new Liberty Bell Pavilion is an important addition to this new plan. The Preferred Alternative also now includes the National Constitution Center at the north end of the 2nd block, creating a critical mass of 2nd block activity with an open and enlivened Free Quaker Meeting House, the Independence Institute and finally, thanks to the generosity of the Pew Charitable Trusts, the proposed Gateway Visitor Center.

The Gateway Visitor Center is the most affirming and important component of the GMP's Preferred Alternative E-1. Pew's vision is more than a building with restrooms and brochures. It has the potential to be the workhorse for the region's tourism industry, providing visitors with the tools they need to access the kind of experience that will be most satisfying for them, whether its down the street or out in Doylestown. And, unlike many of the proposed elements, this incredible opportunity could actually become a reality in our lifetime, if we can stay focused.

The joint responsibility which the City accepts with the Park Service-- to be good stewards of this remarkable treasure, is a public trust which most often goes unspoken until changes are being considered such as the ones being considered in this General Management Plan. The public dialogue and debate has been aggressive, challenging the old assumptions and demanding the highest standard in results. However, considering the limitless realm of possibilities for the Mall, this debate cannot continue forever or there will be no energy, not to mention resources, for the task of implementation.

The plan for the Mall is, in its most significant aspects, excellent, and it is time to move forward. I would like to thank you, Martha Aikens, and the staffs at the Park and Regional levels for honoring our partnership. We look forward to moving ahead with you and Pew and other partners, both public and private, to implement this General Management Plan.

Sincerely,

EA Rendell

Edward G. Rendell

COMMENTS

CENTER CITY DISTRICT

917 Filbert Street
Philadelphia, Pennsylvania
19107
Telephone 215 460 5000
Facsimile 215 872 3073
Internet: www.centercityphila.org

Testimony on the Revised Preferred Alternative of the General Management Plan for Independence National Historical Park

Paul R. Levy, Executive Director, Center City District
September 24, 1996

I am pleased to testify:

- in favor of the revised, preferred alternative plan;
- in favor of placing the Gateway Visitors Center on the north side of Market Street;
- in favor of locating the proposed National Constitution Center on the second block of the Mall; and
- in favor of the decision to leave the third block open for future development.

I would however like to underscore the importance, as the design process proceeds, of adhering more closely than the current document does to two of the most significant design principles articulated by the General Management Plan:

Principal #5: In redeveloping the Mall, reinforce the city's street grid through the placement of buildings and open space to reduce the Mall's isolation from the rest of the city's urban fabric.

Principal #8: Enhance the Mall's pedestrian environment by reconnecting it with the city around and beyond it.

Despite all the debates thus far, the successful achievement of these two goals is probably more important than the specific site locations or designs for the Gateway Visitor Center and the National Constitution Center. For nothing will be accomplished if the city, the National Park Service, private donors, and the Pew Charitable Trusts all invest millions of dollars in new facilities and visitors still do not venture beyond the Mall.

The General Management Plan correctly recognizes the dual role that a redesigned Mall must play: it must be an appropriate setting for the historic sites and stories of our nation's founding and it should serve as a gateway to the city and the region beyond.

The revised document very appropriately recommends the "removal of some existing perimeter walls that limit views from the interior of the Mall" into the rest of the city. It also correctly urges that the city and the private sector "improve the physical environment of the neighborhood so that the public would feel more comfortable visiting the city's many historic, cultural and commercial attractions."

But as the executive director of the private sector Center City District, an organization that spends over \$7 million per year to improve the cleanliness and safety of Center

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Jonathan B. Zaritsky
"C" Office, IDOMA
"Name"
Paul R. Levy
Executive Director



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
315-15 Walnut Street
Philadelphia, PA 19106

IN REPLY WRITE TO:
D19 (INDE)

D19 (INDE)

Mr. Paul R. Levy
Executive Director
Center City District
917 Filbert Street
Philadelphia, Pennsylvania 19107

Dear Mr. Levy:

Thank you and your staff for participating in the public meeting for the General Management Plan for Independence National Historical Park. We are delighted to have the support of an organization with such a solid record of accomplishment and innovation.

As I recall, our unavoidable time constraints at the public meeting caused you to deliver an abbreviated version of your written remarks. That is regrettable because your message is one that is important to share with the community at large. You are quite correct in your perception that many of the problems of the mall are caused by the land uses on surrounding blocks.

While the National Park Service is not in a position to plan for or influence land uses beyond our boundaries, your organization, the Philadelphia City Planning Commission, and other private and municipal agencies do encompass these properties in their missions or jurisdictions. We hope that you and others will accept the challenge of mitigating the damage of the 1900s, and that everyone concerned will "meet us at the fence" to understand our respective responsibilities and scopes.

The National Park Service has proposed closing the 500 block of Chestnut Street to traffic in order to protect the hundreds of visitors and residents who jaywalk there daily, and to protect Independence Mall. When the Chestnut Street Transitway is reopened, we believe the danger to pedestrians will increase. Today, nothing about the Chestnut Street resembles the pedestrian scale of the 18th century, and the founders certainly weren't dodging racing commuters and speeding transit buses, as people must do now.

As you know, the ultimate decision on whether to close the block is the city's. All the streets around the mall were widened by the city and state in order to attract and handle increased traffic. If the 500 block of Chestnut Street is not to be closed, perhaps

COMMENTS

RESPONSES



City and which is currently investing over \$21 million in streetscape improvement, including new lighting and signs for visitors, let me be the first to say the problem is much bigger than this.

In the planning work done by Venturi, Scott Brown and Associates, for example, they note the huge breaks in the continuity of the fabric of the city created by Independence Mall. They offer an evocative drawing showing that the Mall itself is wider than the concrete barrier of I-95 that divides the waterfront from the historic area - a barrier we have spent millions of dollars attempting to bridge in the last two decades. Compounding the problem, they note too, the blank walls and "dead edges" of the United States Mint, the Federal Reserve Bank, and the Federal Office and Courthouse Buildings that discourage visitors from venturing into the city.

But the Revised General Management plan, like the Venturi, Scott Brown and Associates proposals, fall far short of their objectives by attempting to solve through a redesign of the Mall problems that are created as much by the blocks that surround the Mall.

The current environment was created through a massive, federally-funded urban renewal program that demolished hundreds of 18th and 19th century buildings to make way for the Mall and for huge offices and federal facilities that relate very poorly to the pedestrian environment. It is not surprising that today, in an era of limited resources, planning objectives are far more modest. But we are deceiving ourselves as a community if we think that by limiting our vision and our investments to improvements on the Mall, we will correct the deficiencies that surround the Mall. No amount of world-class design or exciting attractions on the Mall will cause visitors to explore Philadelphia if the Mall itself remains an island cut off from the city.

The National Park Service has stewardship for Independence National Park. But it is part of a Federal government that has ownership of the United States Mint, the Federal Reserve Bank, and the Federal Office and Courthouse Buildings.

Venturi, Scott Brown has been retained by the Pew Charitable Trust to design a new Gateway Visitor Center. As urban designers, they have pointed out the contextual problems created by the buildings that surround their site.

But somewhere in this process, someone needs to challenge the other agencies of the Federal government, as well as Rohn & Haas and Core-States Bank, to undo the damage of the 1960s and to come up with plans, as the Bourse Building has done, to dramatically enhance the pedestrian environment around the Mall and to connect it to the fabric of the city. Why not challenge KTW and WHYY to look at what NBC has done at Rockefeller Center in New York City and to make their studios more of an attraction with events that draw people to the public spaces around their buildings? WHYY radio, for example, should not be parking cars and trucks on the sidewalks in front of their building.

These are not public and private buildings located just anywhere. Adjacent to the birthplace of American democracy, they are beneficiaries of a huge public investment in urban renewal. Special obligations are imposed on such buildings.

2

2

you will accept the additional challenge of finding a way to deal with safe and pleasant crossing of Chestnut, Market, Arch, 5th and 6th streets, each of which isolate the individual blocks of the mall by their excessive width and heavy traffic.

Sincerely,

Martha B. Atkins
Martha B. Atkins
Superintendent

COMMENTS

RESPONSES



In this regard I find the proposal to close the 500 block of Chestnut Street truly misguided. There is but one east-west city street crossing through the Park that has preserved the pedestrian scale of the colonial city and that is Chestnut Street. To close this street to traffic is to do to Old City what the Chestnut Street transitway has done to the rest of Center City: kill the vitality of the street. To close Chestnut Street to traffic is to reinforce the isolation of the Mall and to violate two of the governing principles of the General Management Plan.

Our founders did not disappear to a desert mountain top to receive the laws of American democracy. By day, they debated and argued in Independence Hall in the midst of a busy 18th century city. In the evening, they walked on the streets of Philadelphia to restaurants and inns, and returned at night to guest-houses and homes. That is why the powerful principles of the Declaration of Independence and the Constitution still connect so directly to the lives of real people. That is why Independence Mall needs to reconnect to the streets of Philadelphia.

COMMENTS

AIA Philadelphia

A Chapter of The American Institute of Architects



AIA Philadelphia
Testimony at Independence National Historic Park Hearings
REVISED PREFERRED ALTERNATIVE
Wednesday, September 25, 1996

Thank you for the opportunity to comment on the NPS Proposed Plan for Independence National Historical Park. My name is Tom Appelquist, AIA and I am president of the Philadelphia Chapter of the American Institute of Architects, a professional association which represents over 1,100 architects and related professionals in the region including the city of Philadelphia, Montgomery, Chester and Delaware counties.

As you know the Philadelphia Chapter of the American Institute of Architects has, over the past two years, worked to bring issues regarding the redevelopment of Independence Mall to the forefront. We organized a special Task Force to study the problems and opportunities presented by the Mall and in May of 1995 issued a position paper on the Mall outlining principles to guide its redevelopment. AIA Philadelphia's comments on the National Park's Services' Draft General Management Plan reiterated the need to elevate these guiding principles to the forefront. After the public hearings held by the Park Service on the GMP and ensuing controversy about the placement of various uses on the Mall, AIA Philadelphia continued to facilitate discussion with the design community, public officials and the Park Service about the goals to be achieved in the remake of the Mall.

Fueled by a desire to build a Visitor's Center, the Pew Charitable Trusts paid for a study which would give some physical expression to a redeveloped Mall. The AIA held a forum for the design community to help direct comments to the design consultants about the opportunities for the Mall. The AIA strongly supported, as originally suggested in our position paper, the development of a physical expression for the Mall, an important step beyond the Park Service's original management plan. The firm of Venturi Scott Brown and Associates developed very thoughtful plan alternatives which varied the location of the Visitor's Center, the Liberty Bell and the Constitution Center as well as other uses. We applaud the insight revealed by the entirety of their work and the clarity of each plan alternative which we believe greatly influenced the thinking of the Park Service and resulted in major revisions to the general management plan. Without a commitment to the process begun by the Park Service, and supported and

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RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-315 Walnut Street
Philadelphia, PA 19106

DLS (INDE)

NOV 27 1996

Mr. Thomas Appelquist
President, Philadelphia Chapter
American Institute of Architects
117 South 17th Street
Philadelphia, PA 19103

Dear Mr. Appelquist:

Thank you for your encouraging remarks, and indeed for the participation and support of the AIA throughout the planning process for the general management plan. Be assured that we will continue to call on the chapter as we progress into the design phase for Independence Mall.

Sincerely,

Martha B. Alkens
Martha B. Alkens
Superintendent

RESPONSES

COMMENTS

Independence National Historic Park
Revised Preferred Alternative - Page 2

expanded by the Pew Charitable Trust, we don't believe the plan would have evolved as much as it has.

Now, as a result of this process the Park Service has embraced thirteen principles which support four broad goals for the Mall which will help create a more active place and provide greater linkage to the historic area to the east and the commercial district to the west. Principles in the revised plan address the following important issues: scale of Independence Hall, opportunities for views and vistas, the axis as a basis for the organization of buildings and spaces, asymmetry recognizing the differences between the east and west edges, the importance of the open space, the heightened importance of the pedestrian environment, the appropriate accommodation of vehicles, the need for new buildings to reestablish the physical continuity of the street, the concentration of uses on the second block and hence activity, and the appropriateness of increasing the height of facilities with increased distance from Independence Hall in a way that respects the scale of the Hall.

We believe these principles provide an excellent foundation to guide future decisions concerning the redevelopment of the Mall. As we all know, funding for many of the uses discussed in the plan is currently not available. At best it is uncertain and it's not unreasonable to conclude that full implementation won't happen for a generation to come, with the Visitor's Center perhaps being the first major phase of development. Let's embrace the principles put forth in this plan and encourage the Park Service to seek out the highest quality design services for upcoming and future phases of the plan which do not compromise these principles but rather help to give appropriate form to the buildings and spaces that will inevitably take hold incrementally. As your role requires, the National Park Service must be the protector, and ensure that overall development of the whole amounts to much more than the sum of its parts. You must ensure that the new Mall will succeed where the old Mall failed, to focus excitement about our country's history, to seize the enormous opportunity for overnight visitors and to create continuity of place where discontinuity currently reigns.

Once again the Philadelphia Chapter of the American Institute of Architects stands ready to assist in the process to ensure that design excellence is achieved as the plan is implemented and that the Mall is fully integrated into the contemporary life of our city. We also urge that the new spirit of cooperation fostered between the City of Philadelphia and the National Park Service continue, as important issues of governance and funding still need to be resolved if the Mall is to succeed to its full potential for generations to come.

Thank you for the opportunity to comment on the revised plan for Independence National Historic Park.

COMMENTS

Testimony of William P. Becker, representing the Foundation for Architecture regarding the

REVISED PREFERRED ALTERNATIVE

Independence National Historic Park General Management Plan

My name is William P. Becker. I am a member and former chairman of the board of trustees of the Foundation for Architecture. We are a non-profit membership organization whose mission is to promote excellence in the design of the buildings, streets and neighborhoods of the Philadelphia region. We implement our mission through programs of public education and advocacy.

We commend the National Park Service for its continuing effort to improve the substance of the Management Plan and to expand its communication of the reasoning that has guided the Plan's development. We are particularly pleased to see that the revised Plan includes a description of the urban design principles which form the basis for the Plan. We support these principles, and we offer the following comments on several features of the Plan in the hopes that our suggestions will enhance the prospects for achieving the Plan's design objectives.

1. Outdoor Space, Scale and The Axis

We support the Park Service's decision to introduce new construction into the second block along the north frontage of Market Street. We agree that the scale of Independence Hall is not consistent with an axis that extends beyond Market Street, and we believe that a more concentrated outdoor space in the first block will enhance the appreciation of Independence Hall as a work of architecture. Moreover, by creating a northern edge of buildings to the outdoor space in front of Independence Hall, the Plan fundamentally transforms the character of this space from a linear element to a square - a form which is intrinsic to the original William Penn plan for Center City Philadelphia. We believe that this change will contribute significantly to healing the tear in the fabric of the City that resulted from the intrusion of the current half mile long open space.



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
415-15 Walnut Street
Philadelphia, PA 19106

NOV 7 1995

D18 (INDE)

Mr. William P. Becker
Foundation for Architecture
Suite 1165
1617 John P. Kennedy Boulevard
Philadelphia, Pennsylvania 19103

Dear Mr. Becker:

Thank you for participating in the public meeting for the general management plan for Independence National Historical Park, and for the Foundation's participation in and support of the planning process over the past several years. I am pleased to have the support of the Foundation for the current proposal for Independence Hall. Please allow me to respond to a few of the points you make in your testimony.

1. I'll save for another time a discussion with you on how much open space is "more than enough," and I'm sure that it will be a spirited discussion. Regardless, our plan does not propose additional open space on the mall, but rather the retention of approximately the same amount of open space, albeit in different and improved configurations. Because we have concluded that no compelling new use has been suggested for the third block of the mall, we propose postponing a rethinking of that block because conditions around the block may change.

2. It is possible that a competition could be undertaken for the design of a new Liberty Bell pavilion and the first block. However, the National Park Service would not be able to fund such a competition.

3. The National Park Service has proposed closing the 500 block of Chestnut Street to traffic in order to protect the hundreds of visitors and residents who jaywalk there daily, and to protect Independence Hall. When the Chestnut Street Transitway is reopened, we believe the danger to pedestrians will increase. Because Chestnut Street is a city street, the ultimate decision on whether to close the block is the city's.

4. A comprehensive master plan will be undertaken for the second block prior to design of individual structures on that block, and it will be subject to public comment.

RESPONSES

COMMENTS

We encourage the Park Service to maximize the benefits of this open space to visitors and city residents by increasing views through and access to the space, and by supporting a variety of uses within the space. We suggest that the continuing improvements to Rittenhouse Square in Philadelphia, and the rejuvenation of Bryant Park in New York City, provide excellent examples of how such a space can be totally transformed.

We are concerned that the Plan allows the potential for diluting the impact of what should be a unique outdoor space on the first block by including a similar sized open space on the second block. We believe that this area of the City has more than enough outdoor space: the portion of Independence Park between 2nd and 5th Streets; the city block south of Independence Hall; Washington Square; and Franklin Square to the north - a total of more than five square blocks. We oppose the development of any additional large open space on the second or third blocks of the Mall. Instead, we encourage the Park Service to plan for further public or private development on the second and third blocks in order to attract additional visitors and area residents to this unique destination.

2. The Liberty Bell

We agree with the Park Service that the current Liberty Bell pavilion is not successful, and that change is required. We believe that before any architectural solutions are considered, however, the Park Service should determine the character and scale of the physical setting which will best suit the telling of the story and interpretive themes related to the bell. Only when these have been established, can the issues of location and building be properly addressed.

We believe that the setting for the Liberty Bell is the single most important architectural design issue to be addressed in the redevelopment of the Park. We therefore propose that an international competition be undertaken, based upon the space and interpretive requirements established by the Park Service, to determine the best design solution to the Liberty Bell and the surrounding landscape within the balance of the first block.

RESPONSES

5. The National Park Service is not in a position to plan for or influence land uses beyond our boundaries. However, your organization, the Philadelphia City Planning Commission, the Center City District, and other private and municipal agencies do encompass these properties in their missions or jurisdictions. We hope that you and others will accept the challenge of inspiring and working with property owners adjacent to the mall.

Sincerely,

Arthur B. Atkins
Arthur B. Atkins
Superintendent

COMMENTS

RESPONSES

3. Chestnut Street

While we appreciate the Park Service's concerns regarding safety of pedestrians and for the protection of Independence Hall, we urge the Park Service to thoroughly examine alternative means to achieve these objectives rather than to close Chestnut Street between 5th and 6th Streets. Philadelphia's grid pattern of public streets is of the very essence of the historic Penn plan, allowing universal freedom of movement and access. Closing of one of the City's major east-west streets would be directly contrary to the Park Service's stated objectives of maximizing visitor choice and reinforcing the connection between the Park and its urban setting. The history of street closings in downtown areas of Philadelphia and other cities over the past thirty years is generally one of limited benefit and unexpectedly dramatic harm. We oppose this portion of the Plan, and recommend that it be reconsidered.

4. Second Block Development

We support the Plan's placement of new structures along Market and Arch Streets, and we are pleased that the Plan proposes more detailed planning of the entire block before any individual project proceeds. We urge that the future planning studies consider a full range of options, and not be constrained by the size or location of the existing parking structure. This site deserves the absolute best design solution that may be feasibly undertaken, and therefore we believe that the option of demolition of the existing garage should be considered. We encourage the Park Service to consider innovative design approaches of the type employed at Post Office Square in Boston. We believe that a comprehensive redevelopment and design plan for the entire block should be prepared which will include the Gateway Visitors Center, the Independence Park Institute, the Constitution Center, food service and other visitor amenities, bus drop-off and pick-up, automobile parking, and a limited amount of additional open space, and that this plan should be presented to and reviewed by the public before it proceeds.

RESPONSES**COMMENTS****5. Urban Linkages**

We are pleased that the Park Service recognizes the need to improve the connections between the Mall and its adjacent urban context. While we appreciate that the formal content of the Plan must be limited to the property which constitutes the Park itself, we also recognize that city streets are appreciated as single spacial entities, with the activities on both sides of the street contributing equally to the overall character of the experience of those who walk or ride through the street. We therefore encourage the Park Service to work in partnership with property owners along the east side of Fifth Street and the west side of Sixth Street to explore additional opportunities to develop further visitor amenities in appropriate locations.

COMMENTS

Received DSC-PM
SEP 30 1996

The City Conservancy
Conserving and Promoting Urban Assets

1137 LOMBARD STREET
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TEL 215-928-0352
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RONALD B. LEVINE
PRESIDENT

Mary Alkens
Superintendent
INDEPENDENCE NATIONAL HISTORIC PARK
313 Walnut Street
Philadelphia, PA 19106

9 September 1996

Dear Ms. Alkens:

The preliminary plan for the redevelopment of the Independence National Historic Park was released last week and has come to our attention for review. Per our last correspondence, dated 4 July 1996, our group of concerned citizens, businesspeople and architects made specific comments based on a common view that, whatever plans are made for the Park, significant improvements must be made to address the deficiencies inherent in the previous 1953 and 1976 efforts.

We regret to say that, with the one exception of moving the center of development to the Mall, virtually none of the desiderata of good design have been met by the new proposal. Our criticism is based on the following salient points:

Destination design

As we mentioned in our initial review, it is critical to develop a "critical mass" of attractions to assure that visitors to the Park will gravitate to the Mall for an extended experience rather than pass directly to Independence Hall for a 1-hour tour. We advised that the only way to generate such a critical mass was to combine the functions of the Visitor Center, Constitution Center, the Independence Park Institute, and Liberty Bell pavilion into a unified structure. Such a structure could not only sustain attention apart from Independence Hall but could achieve a scale required by modern methods of mass entertainment and multimedia information, such as IMAX projection and theme exhibits. (The model for such exhibits today includes the well-recognized success of the Holocaust Museum in Washington and the Franklin Institute in Philadelphia.)

The preliminary plan instead calls for 4 small isolated buildings, each of which is not even on a scale with the present inadequate 1976 Visitor Center. This concept fails to capitalize on the synergistic effect of linking—both emotionally and physically—the concepts of constitutional democracy and its physical embodiment, the Liberty Bell. None of these buildings, in and of themselves, will generate the interest or have the entertainment or educational capacity to become successful national destinations.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

NOV 07 1996

Mr. Ronald B. Levine
President
The City Conservancy
1137 Lombard Street
Philadelphia, Pennsylvania 19147

Dear Mr. Levine:

I regret that you are disappointed with the current Preferred Alternative for Independence National Historical Park. I will respond to your concerns in the order in which you have raised them.

Neither the park nor the City of Philadelphia are "theme parks," and to apply the rationale of capturing visitors in one place would obviate the goal of attracting visitors to resources throughout the park, city and region. Visitors come to Philadelphia to experience history: to walk on our historic streets and through our historic buildings, to see it for themselves. The concept behind the redevelopment of Independence Hall is enabling visitors to do just that, rather than stalling them within movies or museums. When tourism development is considered, the park and the city do have a critical mass of attractions, and the addition of anticipated new facilities, programs, and most importantly, marketing will enhance this attribute.

Because the plan is conceptual, it does not indicate or predict the size or scale of proposed buildings. Only the development zones within which a building might be located are indicated.

The National Park Service has proposed closing the 500 block of Chestnut Street to traffic in order to protect the hundreds of visitors and residents who jaywalk there daily, and to protect Independence Hall. The Chestnut Street Transitway, west of this block, is in fact still closed to traffic except for buses and trucks, when it is reopened, we believe the danger to pedestrians will increase. Because Chestnut Street is a city street, the ultimate decision on whether to close the block is the city's.

A decision on the location of the proposed bus drop off area will be influenced by results of a study of the underground parking

COMMENTS

The City Conservancy
 Ronald B. Levine
 9 September 1986, p. 2

Traffic flow

Unfortunately, one bad design choice has begotten the next: The proposal to close Chestnut Street. This is, perhaps, necessitated by the needs for crowd control around the ill-advised retention of the Liberty Bell Pavilion on Mall Block 1. (As noted above, we advocate the Liberty Bell to be integrated into a single Constitution Center structure on Mall Block 2; in part, to eliminate this problem.) The closure of city streets for tourist and commercial zoning has been found to be universally disastrous in most American cities. Instead of fostering tourism and commerce, the restricted traffic makes the area inaccessible and deprives it of its essential urban character. Ironically, Chestnut Street, which was closed to traffic as a part of the earlier Independence Mall redevelopment in 1976, has been reopened to traffic only a few years ago--and we are now to make the same mistake again 2 decades later!

In addition, the plan advocates that Mall Block 2 be bisected by a bus ramp--thus, an area that is already to be weakened by multiple, diminutive building designs is to be made even less hospitable with the constant noise, pollution and traffic of bus circulation. (In contrast, we advocate minimizing the Mall presence of buses by discharging passengers at the side of the Mall and moving the busses off-site as quickly as possible via an underutilized tunnel under the Ben Franklin Bridge approach.)

We strongly urge you and the National Park Service to reject the preliminary plan. It not only fails to achieve its immediate objectives of addressing the failures of previous Mall efforts but ignores the lessons taught by the most successful examples of modern exhibit design and theme park development.

If, indeed, this is the "best" that we are to expect from current planning, we advocate a simple solution: Simply repair the Lewis Fountain and wait for another time in the future when Federal budgets and creativity can allow for a more definitive development.

Sincerely,



Ronald B. Levine
 President

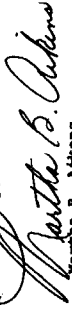
RBL/Alkens2
 cc: Bruce Babbitt, Secretary of the Interior
 Roger G. Kennedy, Director of the National Park Service
 Edward G. Rendell, Mayor of the City of Philadelphia
 Rebecca Rimey, President of the Pew Charitable Trusts

RESPONSES

2

garage, and analysis of the capacity of the streets. Forty percent (40%) of our visitors arrive on tour and school buses and the need for an adequate and gracious way to handle the buses is absolute.

Sincerely,



Martha B. Atkins
 Superintendent

COMMENTS

Received DSC:PM
OCT 23 1996

Ad Hoc Architectural Joint Committee
307 South Chadwick Street
Philadelphia, PA 19103
17 October 1996

Ms. Martha Aikens
Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

Dear Ms. Aikens:

The redesign of Independence Mall is clearly the most important civic design challenge facing the National Park Service as we approach the millennium. Is the Revised Preferred Alternative the best we can do? While this revised plan is competent in many respects, the concept does not appear to evolve from a compelling vision of Independence Mall as one of the world's most important historical sites.

Such a vision is not likely to emerge from studying the arrangement of buildings and program elements on a large greensward, no matter how thoughtful the process may be. Participants in the planning process should step back from the current pragmatic but not very inspired plan, and focus instead on a series of strategic questions intended to define the true and complex mission of Independence Mall, and then initiate an effective search for a powerful, inspiring and imaginative "organizing idea" responsive to the enormous challenge and unique opportunity at hand.

The National Park Service has been asking the wrong questions about the Mall. The essential issues are not how to get school children off buses, how to orient visitors to the National Park, or how to deal with traffic patterns. The question that must be asked is how can the redesigned Independence Mall capture and express the spirit and the soul of the idea of democracy and constitutional government? The new Mall must convey the grandeur of the most compelling and influential idea of the Enlightenment, one that changed the human condition forever.

The design must be so inspiring that visitors, both American and foreign, will be emotionally jaded to the momentous events that took place in Philadelphia in that hot summer of 1799. The planners must seek to create a presence that represents the poetics of liberty, the dream of self-government, and the promise of justice. This place must convey the passion of the men who forged the remarkable new ideas that still inspire people from around the world.

Independence Mall should be:

- a place that inspires;
- a place of civic beauty;
- a place that conveys values;
- a place to celebrate freedom;
- a place to remember the past;
- a place of promise and accomplishment;
- a place to envision the future.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
313-315 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

NOV 07 1996

Mr. Frank Weisse, et al
Ad Hoc Architectural Joint Committee
307 South Chadwick Street
Philadelphia, Pennsylvania 19103

Dear Mr. Weisse:

As I read your letter, I found myself somewhat bewildered by its charge that the National Park Service has not asked the question of how a redesigned Independence Mall might "capture and express the spirit and soul of the idea of democracy and constitutional government." I am bewildered because a number of your co-signers have been involved with the planning process since its early days, and must surely remember that this and other questions of goals and visions for the future were the key area of concentration as we began the process. Indeed, the list of desired qualities for the mall which you provide seems to have sprung from the summaries of public workshops which we published in 1994 and 1995. To jog your collective memory, I have enclosed copies of two newsletters which report discussions of the very concepts for which you are still seeking answers.

Independence Mall is not a historic site at all. It was designed and developed to be a modern attempt to achieve a set of goals as divergent as commemoration and real estate promotion. Because it has no historical value, it has great value now as a blank slate on which to express the ideals that many people, and now you, have expressed for its future.

I urge you to understand not only the ideals from which our plan has sprung, but also the frankly pragmatic concerns that are necessary to consider when planning for 15 acres that will receive heavy public use. Both are the context within which we have worked with the public to develop the plan.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

COMMENTS

RESPONSES

Several recent projects have been built that demonstrate that this can happen - the Vietnam War Memorial and the Holocaust Museum. No matter what one thinks before entering, the power of these places deeply moves the visitor, emotionally and intellectually, and perhaps changes them forever. No one questions how the buses get unloaded, one responds to the essential spirit of the place and is moved. The Constitution Center has a decided advantage in that extraordinarily positive events took place here: the declaration of a people's ability to govern themselves in a just and democratic manner.

The power and spirit of place do not come by making theme parks, or by presenting multimedia entertainment, or projecting bits of information, or constructing sterile monuments. It comes from addressing the essential question of what this place should convey about the events that occurred here which changed the course of history. This question must focus on the content of the place as well as the exhibits. The question must be answered at several levels: nationally, internationally, and locally. At the national level, the constitution embodies the core values of our country. From the international perspective, the "miracle of Philadelphia" symbolizes the hope of all peoples to achieve self-government and individual liberty. For Philadelphia, the events that took place here make this city unique. This is the Mecca to celebrate democracy.

Any day one can see people of all ages from all over the world visiting Philadelphia's historical sites, but the existing settings offer little beyond a clear view of Independence Hall and the Liberty Bell. The visit should be a memorable one that inspires the individual to contemplate the grandeur of the Declaration of Independence, the Constitution, and the Bill of Rights, and the obligation to keep alive the values they express. The design of Independence Mall should not be merely the answer to the pragmatic needs of visitors but should stir their passion and ignite their imagination.

So said, it behooves us to ask: how can we consciously and deliberately set about to rebuild the Mall with presence and beauty? As Louis Kahn, Philadelphia's late great architect would have asked, "What does it want to be?" The function of all great art (and architecture) being to evoke the heroic mood, how can we - with stone, brick, water, wind, grass and light - create an enchanting place where multitudes will eagerly visit and revisit - to learn, to reflect, to mingle and bask in the sheer beauty and wonder of the place; to be inspired by the miracle of what happened here in Philadelphia. Can we create "a here, here?"

Some suggestions to make the invisible visible:

- One: Let the design of the Park and its component structures manifest and evince:
- a timely timelessness,
 - echoing poetic metaphors,
 - the joy of the everlasting pursuit of the unattainable - goals and ideals;
- Two: Let the Mall become a 3-block long unbroken park, by over-passing the noise and traffic of the existing east-west cross streets;
- Three: Let a great, grand plaza front the Old State House - to include amenities such as a marvelous fountain, glorious artwork and lively outdoor cafes;
- Four: Let beautifully conceived residential structures edge both sides of the Mall - to screen the mostly eyeless, unprepossessing corporate buildings, to make intimate and enliven the Mall with a community of habitation;
- Five: Let all new structures match in imagination and presence the genius and vision of the founders of the republic. Good buildings are always in context; great buildings endure in perpetuity;

COMMENTS

RESPONSES

Six: Let the exhibits within the structures resonate with the spirit of the founders. Explore the myths, the twilight condition and restoration of institutions, the world of 1787, the future of democratic society. As to methods of communication, let there be resistance to any tendency to trivialize our great heritage to excite viewer interest by resorting to the blandishment of mere entertainments.

Given the magnitude of the challenges posed by Independence Mall, we urge the National Park Service and The Pew Charitable Trusts to consider an international competition for the design of all or parts of the Mall. The founders of our country achieved brilliance in forging our government and we should do no less in honoring their accomplishments. Every country worldwide has a bit of itself, a bit of land dedicated to its originator, its identity. In every way, in every particular, the Mall shall elicit our utmost.

Sincerely,

The Ad Hoc Architectural Joint Committee:

Frank Weise
Frank Weise, Convener

Sandy Bressler
Sandy Bressler

Norman Day
Norman Day

Steve Hamill
Steve Hamill

Alvin Kodin
Alvin Kodin

John Lawson
John Lawson

Walter Maleski

Sharon M. Moleski
Sharon M. Moleski

Johan Sheikholesami

George Yu
George Yu

COMMENTS

On the Mall David B. Brownlee September 1996

We have learned a lot about Independence Mall over the last year, and for that we have to thank the National Park Service for being an intelligent client and Venturi, Scott Brown, and Associates for providing intelligent advice in the report that they completed several months ago. Their work was generously paid for by the Pew Charitable Trusts, and so we must thank them, too.

My principal point tonight is that, as much as we have learned, there is a huge amount left figure out--something that is masked by the finished-looking pictures produced by the Inquirer's artists. The design is actually at a much more conceptual level, and resolving the remaining thorny questions requires the resumption of a vibrant relationship between a question-asking client and a problem-solving architect.

But, having said that, I want to say that we now have a good place to start and that the National Park Service's latest thinking extracts vital lessons from the work of the consulting architects.

Most importantly, they recognize that the Mall is too large to be a respectful setting for the dignified but house-sized building--Independence Hall--in which our nation's founders gathered more than 200 years ago. The vast emptiness of the Mall is a problem; already in the 1950s Lewis Mumford, the great urban observer, complained that the Mall "nearly killed the shrine with kindness." (The shrine is Independence Hall.) The new National Park Service plan acknowledges and solves that problem by locating the Gateway Visitors Center on Market Street, where it can frame the southern block of the Mall and create a generous but properly scaled urban place.

1



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
31513 Walnut Street
Philadelphia, PA 19106

D18 (INDE)
NOV 07 1996

Mr. David B. Brownlee, Professor
School of Arts and Sciences
Department of the History of Art
Jaffe History of Art Building
Philadelphia, PA 19104

Dear Professor Brownlee:

Thanks for your participation in the public meeting for the general management plan (GMP) for Independence National Historical Park, and for your interest and thoughtful observations during the past year. Please let me comment on some of the problems you noted in your written testimony.

We do not currently know enough about the condition of the underground parking garage to make firm decisions about locations of surface elements which may or may not be located over the garage. At this writing, we hope to have detailed information quite soon. While the GMP will remain flexible--stating criteria rather than specific locations--the future structural capacity of the parking garage certainly will inform the next phase of planning and design.

The precise siting of the Gateway Visitor Center, and for that matter the Independence Park Institute and the cafe, also await the next phase of planning. Because the GMP has considered visual relationships only at the most conceptual level, it would be premature to conclude that a vista will be retained or precluded. We want to give planners and designers the latitude to find the best solution when a more detailed examination of this issue is undertaken.

The National Park Service has proposed closing the 500 block of Chestnut Street to traffic in order to protect the hundreds of visitors and residents who jaywalk there daily, and to protect Independence Hall. When the Chestnut Street Transitway is reopened, we believe the danger to pedestrians will increase. As you know, Chestnut Street falls under the city's jurisdiction, and the decision on whether or not to close it will be the city's. If it is not to be closed, what other means might be provided to protect both visitors and historic resources?

The work of Venturi Scott Brown & Associates was very important in presenting new options and in clarifying and focusing attention on

COMMENTS

That placement also solves another intractable problem--how to position the visitors' center to serve also as an introduction to the whole city. The proposal does this by restoring the urban continuity of Market Street across the Mall, reviving the linkage westward to our department stores (whatever they're named), the Convention Center, and the Gallery shopping mall, and eastward to the revitalized east end of Market Street and Old City.

Those I think are very good ideas: brilliant solutions to two really tough problems, and both are solved with the one building (the Visitors' Center) for which there is a prospect of funding (again from the Pew Trusts).

But there are more problems ahead, and I will note here just three.

First, the decaying parking garage in the second block of the Mall, north of Market Street, will not in its present form permit all of the proposed construction in that area. The plan published by the Inquirer errs, I believe, in showing sufficient room north of the garage for both the vital bus drop-off and the Constitution Center--that grand and important project which is still, it must be admitted, at the "where's the beef" stage of planning and funding.

The second unsolved problem is the precise siting of the Visitors' Center on Market Street. One of the National Park Service proposals shows it pushed to the western, Sixth Street side of the Mall and away from the prime north-south pedestrian axis on Fifth Street. This is done in order to preserve the so-called "vista" to Independence Hall from the northern reaches of the Mall. But there is darn little vista there today, and if there were more vista, Independence Hall would not be big enough to command it. I think it would be much better to concentrate on accentuating the wonderful viewability of Independence Hall from no more than about a block away--and from the

2

RESPONSES

2

issues of urban design and the relationship of the mall to its surroundings. A synopsis of the work was published this summer in Architectural Record. We hope to publish a synopsis of the work as part of the public comment section of the final GMP, this spring.

Sincerely,

Martha B. Atkins
Martha B. Atkins
Superintendent

RESPONSES

COMMENTS

Visitors' Center itself. (Parenthetically, the Park Service has also, I think prematurely, put aside the possibility of placing the center on the south side of Market Street. In that location its north facade could be adjusted to partake of the commercial bustle of Market Street while simultaneously shielding the eighteenth-century shrine from those effects.)

The third problem I see stems from the fact that the Park Service--rightly concerned about security in a day when bombs can be built out of fertilizer--has felt compelled to suggest the closing of Chestnut Street. This would seriously disrupt the life of the city, cutting it in half and detaching the Mall from its environment. A better solution is needed.

In conclusion, I think we are on our way, but terrifically hard problems still await solutions. Let's applaud Pew and the National Park Service and ask them to re-establish the kind of fruitful partnership between a demanding client and a resourceful architect that has gotten us this far.

And one final question--couldn't they publish the Venturi Scott Brown report and drawings that helped them get to this point?

UNIVERSITY of PENNSYLVANIA

David B. Browne
Professor
School of Arts and Sciences
Department of the History of Art
Jeffrey M. H. Brown Building
Philadelphia, PA 19104-6206
215-896-6277

COMMENTS

University of Pennsylvania Museum of A. & A.
33rd and Spruce Sts.
Phila., PA 19104-6324*

Received DSC-PM
OCT 25 1996

OCTOBER 3, 1996

Superintendent,
Independence National Historical Park
Philadelphia, PA 19106

Dear Ms Aiken:

With reference to the Revised Preferred Alternative Plan for the Mall, I have the following response:

15. "Gateway Element". The Museum of Philadelphia could be incorporated in this location. Philadelphia is a the Gateway to Independence National Historical Park and its interpretation. A beginning for the visitor here would be a logical introduction to the Mall interpretive features and Independence Hall.
16. Picnic area. The central access to the Mall must be kept open. The picnic areas should be lateral to it.
4. Constitution Center. This is the main new development of the Mall, and should include or be directly associated with the (9) First Amendment Rights and the Declaration of Independence which should be interpreted here. The maintenance area should be off-Mall.
8. Drop off. Why isn't the drop off and pickup at 15 Gateway?
- (The crowds still have to cross Market as well as Arch.)
1. Gateway Visitor Center. This facility would be the dominant Mall feature for viewing Independence Hall, blocking any view from the Constitution Center, unless the Constitution Center building were tall enough to afford a view over it. The "Independence Park Institute" would logically be in the Visitor Center, rather than in a separate competing (smaller?) building. The Landis Memorial should be in back of 2, not competing with the view of Independence Hall.
10. Liberty Bell Pavilion should be below grade so that the viewer looking past it to the south would see only Independence Hall and not the Penn Mutual high rise building in back of it. The access could be by a gently sloping access down from the north and up to the south. If the Liberty Bell, alternatively, is displayed in an impressive above-ground structure, it should be viewed from the north so that the viewer sees the Hall to the south. The Penn Mutual Building should be screened out above Independence Hall by a false horizon above the Hall. This is not an impossible challenge for the modern architect using modern optical screening devices.

* Please note my correct address above, not this:

John L. Cotter
Univ. of PA Museum of Archaeology
333 College Hall
Philadelphia PA 19104

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

NOV 07 1996

Dr. John L. Cotter
University of Pennsylvania Museum of Archaeology
33rd and Spruce Streets
Philadelphia, Pennsylvania 19104

Dear Dr. Cotter:

Thank you for attending the public meeting for the General Management Plan (GMP) for Independence National Historical Park and for your letter of response.

As you can imagine, a great deal of study, thought and analysis was the basis for the current alternative plan for the park. It is difficult for me to adequately reflect the depth of that work in a letter, although I do want to respond to your many suggestions for alterations to the plan. So please forgive me if I will summarize a response to each suggestion, using the same order in your letter.

The group of people who are trying to organize a history museum for Philadelphia came to the conclusion some time ago that Independence Hall is not a suitable site for their endeavor. We concur with that conclusion.

The entire third block of the mall can be considered to be available for picnicking, and no physical changes are necessary to accommodate this use.

We do not consider the National Constitution Center to be the primary element on the mall, but rather an integral piece of the whole. In its proposed location it would, in fact, be adjacent to an area intended for First Amendment Rights activities. The maintenance area will remain on the mall because the large increase in visitor use of the mall and the high level of new development will require the most proximate and efficient maintenance effort possible.

The drop off area will be located close to the visitor center to encourage arriving visitors to go there first. A remote location for the drop off would obviate this advantage.

Independence Hall has four sides, and can and will be viewed from many different areas and directions, not solely from the new

COMMENTS

14. West Wing Independence Hall is too small for interpreting the Declaration of Independence. It is logically associated with the Constitution and Bill of Rights interpretation in the vicinity or incorporated in the Constitution building.

24. The existing Third St. Visitor Center should house and interpret the archaeological as well as the architectural collections. It would be good if the ugly and obtrusive brick tower were removed from in front of the VC and replaced by nothing or three flagpoles with the National, State, and City flags displayed.

25. The Mercantile Exchange was a significant part of the city's business life. There is room here for Park administration and interpretation of the Exchange so that the architectural significance of the building will not be lost.

Welcome Park is the site of William Penn's State Roof House, but the house is not interpreted adequately at this site. No picture of the house is offered, and no site marker is erected, as at Franklin Court. Either the house should be reconstructed with historical accuracy on the original plot or adequate interpretation with illustrations, models, and a delineation of its location should be provided.

18. Washington Square. How would the African-American Experience be interpreted here? In a building intruding on the Square and the Unknown Soldier memorial? This area belongs to the story of those buried here--the citizens and soldiers who died of diseases, disasters, and neglect.

The Mall is a splendid and very necessary fulfillment of the interpretation of Philadelphia and its great Park to the visiting public. The plan outlined here is doable and the sooner it is started the better. Philadelphia and the Nation need it.

Sincerely,

John L. Couter
John L. Couter

RESPONSES

2

visitor center. The National Constitution Center will not be housed in a tall building, and providing a view from the center to Independence Hall was not a key factor in organizing elements on the mall. While we do not know as yet the precise location of the Independence Park Institute, we do not anticipate that any elements on the mall will "compete" with any others. I assume that "Landis Memorial" refers to an element commemorating Judge Edwin O. Lewis, which is likely to be sited within the visitor center.

Your suggestions for the siting of the Liberty Bell Pavilion can be considered when detailed planning for the first block begins.

I appreciate your concern for the display of the park's copy of the Declaration of Independence. We believe that the West wing of the very building in which the document was created is the ideal location for its display and interpretation. The combination of authentic site, interpretive design, and staff expertise will result in a wonderful experience for visitors.

We agree that the Third Street Visitor Center could be a good place to house and partially display both collections, and this concept is incorporated in the GAP. There is no intention to remove the tower.

While there will not be adequate room in the interior of the Merchants Exchange for its interpretation, additional waysides could be placed on its exterior.

Reconstruction of the State Roof House cannot be justified. At the time Welcome Park was established, a decision was made to emphasize the lasting accomplishments of William Penn, rather than the house in which he dwelled so briefly.

Interpretation of the themes associated with Washington Square will be accomplished through wayside exhibits and professional staff. No structures will be erected on the square.

Sincerely,

Martha B. Atkins
Martha B. Atkins
Superintendent

COMMENTS

09/17/96 08:38 202 219 1411 NPS-LEISURE/LEISURE 001-001

(2000 JUNE - 11/23)

THE WILLIAM PENN FOUNDATION
Two Logan Square - 11th Floor
100 North 18th Street
Philadelphia, Pennsylvania 19103-2757
215-988-1830 Fax: 215-988-1823

August 23, 1996

Mr. Roger Kennedy
Director
National Park Service
1849 "C" Street, N.W.
Washington, D.C. 20240

Dear Mr. Kennedy:

When I mentioned to my husband, John, that Mayor Rendell suggested I write to you, John said, "Mom and I met him and I think that he stayed at our Barclay House on Delaware Street." Is it true? Perhaps you know that Daphne died almost ten years ago and Omo, 2-1/2 years ago. We continue to miss them.

But, this letter concerns my thoughts about Independence Mall. I hope that it is not audacious to write you.

As you know, the Pew Trusts have developed plans to construct a Visitors Center on either the north or south side of Market Street. I believe that this placement would be a significant mistake. The fact that there are currently three blocks of relatively open space at this location is virtually unique for our City. People relish open space in order to escape (even momentarily) the omnipresent congestion of City life.

The Mall in Washington is a good example of the value of this type of space. Whenever we visit, it is alive with people having fun while engaged in simple activities. Even at night time it is quite lively.

A Visitors Center, especially one of modern rather than colonial or "archetypal" design, would significantly impair the sense of ease and aesthetics that is currently present on the Mall and could readily be enhanced. It would also detract from a new Liberty Bell Pavilion.

I understand that placing a number of buildings close together in the "first block" might have historic merit, but one has only to wander many of the Philadelphia's streets in this very area to gain such appreciation. It seems to me that contemporary times should instead inspire us to preserve what little openness and perspective is yet available in such a busy site!

NO 95:00 201 98-21-005

10-4

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
National Field Area
U.S. Capitol Building
200 Chamber Street
Philadelphia, Pennsylvania 19106



September 30, 1996

(NEPA-GETT)

Dr. Janet Haas
Chair
The William Penn Foundation
Two Logan Square, 11th Floor
100 North 18th Street
Philadelphia, Pennsylvania 19103-2757

Dear Dr. Haas:

Thank you for your recent letter to Director Roger G. Kennedy. He has shared it with me and asked me to respond to you.

We certainly share your concern for the preservation of open space in Philadelphia. At 44 acres, Independence National Historical Park is the most significant parkland in Center City. Limited development is needed, however, to serve the needs of the growing number of visitors to the park and to mitigate the impact of visitor-generated traffic on the park's and the community's historic resources. Independence Mall, which is not historically significant and which is the closest area of the park to the pertinent interstate highway exits, presents itself as the best area of the park in which to concentrate needed development.

The second block of the mall, on which development would be sited, currently is almost completely hard surfaced. Our plan for redevelopment would result in the establishment of a greener area than there is presently.

A primary objective for a new Visitor Center is that it be located in places so convenient that most, if not all, visitors would benefit from the orientation to the park, city and region that will be available there. We have rigorously explored the question of a location for new Visitor Center over the past 3 years, and have listened to the public alternative plans that tried out several locations on the second and third blocks of the mall. The current proposed location on the north side of Market Street appears to be the most strategic and most feasible of any considered.

COMMENTS

RESPONSES

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09/17/96 09:30

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MPS/LEGISLATION

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Mr. Roger Kennedy
August 21, 1996
Page two

Therefore, I urge you to consider strongly placing the Visitors' Center further north, at least on either the north or south side of Arch Street. This would serve our visitors and would at the same time prevent noisy, smelly, large buses from overpowering the Mall.

I know that such placement (particularly my favorite, North of Arch Street) raises a question of being too far to walk to Independence Hall. For most people, particularly clubby, sedentary Americans, it would in fact be good exercise to walk a city block. For others, including the elderly and disabled, a lift transportation system could easily be designed which could be efficient, fun, and historic. Since my specialty in Medicine is rehabilitation with a particular emphasis on brain injured patients, I really am very familiar with barriers to effective movement.

I do hope that I have not been far too bold by in writing to you; I care so much that I didn't want to remain silent. I am not an expert in history, architecture or any other relevant field, nor do I have any vested interest in this, but I do love the City of Philadelphia.

I wish you well in making this difficult decision. Clearly your job has many challenges and I am grateful to you for helping Americans preserve and utilize our wonderful national parks wisely. Thank you.

Sincerely,

Janet Haas (wsl)
Janet Haas, M.D.
Chair

JH:wsl

2

Many potential plans for the mall have been circulated, not only by the National Park Service, but by many interested citizens and organizations. Enclosed is a copy of the National Park Service's current preferred alternative plan for your use.

Please contact me if you would like to discuss the plan or if I can answer any questions for you.

Sincerely,

Marie Rust
Marie Rust
Field Director

Enclosure:
As stated.

COMMENTS

Received D5C-PM
OCT 23 1996



October 10, 1996

Ms. Martha Alkens, Superintendent
Independence National Historic Park
313 Walnut St.
Philadelphia, PA 19106

Proposed Closing of Chestnut Street

Dear Ms. Alkens:

Despite our earlier protests and opposition, we again find that the Park Service proposes to close Chestnut Street between 5th and 6th Streets in connection with the renovation of Independence National Historic Park.

We repeat our opposition: The closing of Chestnut Street will severely impact the adjoining residential neighborhood, by requiring that all traffic which now uses Chestnut Street to turn south at 6th Street and proceed east on Pine Street. Pine Street is already an overused local street, treated by many motorists and cab drivers as a speedway. It is the site of numerous accidents, with resulting personal injury and property damage. It is, unfortunately, only a matter of time before someone—pedestrian, driver, or passenger—is killed on Pine Street by the unruly traffic. *We cannot tolerate more traffic on Pine Street!*

It is highly objectionable, even outrageous, to find that our national Government continues to propose to inflict this malady upon us after being advised of the intolerable conditions that the closing of Chestnut Street will cause to the adjoining neighborhood. We appeal to you and your associates to abandon this absurd and dangerous plan. We also appeal, by copies of this letter, to our City government, our representatives in City Council, our Senator and Representatives in Harrisburg, and our Congressmen and our United States Senators.

Box 3 • Philadelphia, Pennsylvania 19105 • Tel: 215-629-1288 • Fax: 215-629-1288

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historic Park
311-315 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

NOV 07 1996

Mr. Melvin J. Buckman
President
Society Hill Civic Association
Box 3
Philadelphia, Pennsylvania 19105

Dear Mr. Buckman:

I have received your letter of October 10, 1996 regarding the proposed closing of the 500 block of Chestnut Street. In response to the Society Hill Civic Association's concerns as expressed last year, the National Park Service contracted with Orth Rodgers & Associates, Inc., for additional analysis of the potential impacts of closure on the neighborhood. I enclose a copy of the results of this work for your use, and I quote from the pertinent material:

Because of the proximity of Market Street, and also because of the origin and destination of traffic using the 500 block of Chestnut Street, (Orth Rodgers) conclude that 90% or more of Chestnut Street traffic would divert to Market Street if the 500 block of Chestnut Street were closed. This includes all SEPTA bus traffic, as indicated by SEPTA operations staff at a meeting in December, 1994.

A small portion of traffic now using the 500 block of Chestnut Street will reroute to Pine Street; this will be limited to traffic originating south of Locust Street which now travels north on 7th Street to get to Chestnut. This volume is estimated at no more than 20 vehicles in the morning peak hour and 50 vehicles in the evening peak hour. Increased volume on Pine Street should be limited to the area between 8th and 5th Streets. 5th Street from Pine to Chestnut Street would experience a similar small increase.


As you note, a possible means to handle the impact of closing Chestnut Street is to reroute one block of 6th Street. This and other possibilities were included in Orth Rodgers' original traffic study, dated April 28, 1995, which we forwarded to the Association last year.

COMMENTS

Ms. Martha Aikens
October 10, 1996
Page Two

I would be most pleased to learn that the Park Service has modified this proposal to avoid placing this extra burden on Pine Street or any other residential street in the area. Again, a possible solution might be to route the traffic north on 6th to Market, then East on Market Street. This may involve some small re-arrangement of the Park, but would save our neighborhood from the ravages of the existing plan.

Very truly yours,


Melvin J. Backman
President

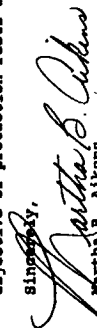
cc: Hon. Edward G. Rendell, Mayor of Philadelphia
Hon. John Street, President, City Council of Philadelphia
Hon. James Kenney, Councilman at Large
Hon. Frank DiCicco, Councilman, First District
Hon. Vincent Fumo, State Senator
Hon. Curtis Thomas, State Representative
Hon. Marie Lederer, State Representative
Hon. Thomas Foglietta, U.S. House of Representatives
Hon. Robert Borski, U.S. House of Representatives
Hon. Arlen Specter, United States Senate
Hon. Rick Santorum, United States Senate

-jst

RESPONSES

We believe that our proposal to close the block to traffic is the most responsible means to protect both Independence Hall and also the hundreds of pedestrians - visitors and residents - who cross here each day. Because Chestnut Street is a city street, a decision to close it or to develop other means to achieve the objective of protection rests with the city.

Sincerely,


Martha G. Aikens
Superintendent

Enclosure

COMMENTS

philadelphia yearly meeting

religious society of friends

October 18, 1995

1515 Cherry Street, Philadelphia, PA 19102 (215) 241-7241

Martha Aikens, Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

Dear Martha Aikens,

The Historic District Task Group of Philadelphia Yearly Meeting of the Religious Society of Friends (Quakers) has studied the revised Draft General Management Plan for Independence National Historical Park and welcomes the opportunity to share our response with you, building upon our earlier comments dated November 20, 1995.

1) We see this new plan as a significant improvement over earlier suggestions and are gratified to note concern for development within the context of urban design principles which include site lines, perspective, and the community context for planned components.

2) We are very pleased with the Park's clearly stated commitment to include as one of its interpretive themes the story of 18th Century Philadelphia, including the city's "founding Quaker spirit of tolerance and freedom [which] made it the logical birthplace for the new nation".

Philadelphia Yearly Meeting of the Religious Society of Friends has established this Historic District Task Group -- composed of numerous Quaker historians and others experienced in interpreting historical Quaker information accurately -- in part to serve as a mechanism for full participation of Quakers in all stages of the development of interpretive material on this theme. We offer you the services of a group representing a wide variety of expertise and skills. We suggest the development of an on-going collaborative process through the establishment of a joint body of our members and representatives from the Friends of Independence National Historical Park, the Independence Park Institute, and the National Constitution Center, so that we can provide periodic and regular assistance on a continuous basis.

3) We have some concern for plans for the north end of Block 2, near Arch Street. There appears to be the possibility of a clustering of buildings and activities very close to the small Free Quaker Meeting House Museum. The plan seems to propose what will be an exceptionally busy, noisy, and air-polluting bus drop-off location very close to this handsome, original example of 18th century Quaker architecture. We are concerned that the historical context and ambience may be destroyed by such a plan. Certainly, if the bus drop-off is to be in that vicinity, it should be located on the side of the block near 6th Street, not 5th.

4) How Quakerism is interpreted within the Free Quaker Meeting House continues to be a major concern for us. Any interpretation which refers almost exclusively to the Free Quakers (a small off-shoot from the main body of Friends) and fails to describe clearly the larger group of Friends who upheld the original principles

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

NOV 07 1995

DIS (INDE)

Mr. Harria Eckstut, Clerk
Philadelphia Historic District Task Group
Philadelphia Yearly Meeting
Religious Society of Friends
1515 Cherry Street
Philadelphia, Pennsylvania 19102

Dear Mr. Eckstut:

Thank you for your letter and for the Task Group's work in analyzing and responding to the General Management Plan for Independence National Historical Park.

I appreciate your offer to participate in developing the portion of the park's interpretive message which deals with the influence of Quakers and Quakerism on the events of the 18th century. I have passed your letter on to the park's new Chief of Interpretation, Christopher Schillizzi, who looks forward to meeting you. The Free Quaker Meeting House must become a stronger part of the park, both physically and programmatically, and we will welcome your thoughts on interpretation of this story.

A decision on the location of the bus drop off will be the result of many factors, including the load bearing capacity of the underground parking garage, and the capacity of city streets to handle new bus circulation patterns, as well as the factors you note in your letter. Regrettably, the building's historic context was lost when its surroundings were demolished in the 1950s, and we must study new possibilities for an appropriate setting.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

cc: Christopher Schillizzi

COMMENTS

RESPONSES

upon which Pennsylvania was founded does a disservice to the true history of the region and to our denomination. At this time concentration on an extinct branch leads the public to believe that Quakers no longer exist. The presentation of information about the Free Quakers within the broader context, as well as signs referring visitors to the Arch Street Meeting House one block away, and active referrals to the Quaker Information Center, would greatly improve the current situation.

We strongly urge solid collaborative efforts between us, the Park Service staff, and the Friends of NHP in developing information which is more faithful to the complexities of the issues Quakers faced during the Revolutionary period. We also hope that the hours when the Free Quaker Meeting House is open and staffed will be the same as for other buildings in use in the Park.

- 5) The current and planned usage for the Pemberton House exemplifies our concern for how historic sites are used and interpreted. The Pembertons were strong pacifists. The distinctive Quaker context of that site runs counter to its usage as a military museum. We would prefer that such discordant usage not occur, but if it must, we request that clearly and accurately worded information be available to tourists at that site. We would be happy to work with you to develop a visible sign and a booklet which people could take away with them.

- 6) With regard to the ambitious scope of the plans, involving some very expensive elements, we reiterate our conviction that wherever possible existing structures should be used before spending large amounts on new construction. It has been our experience that when there is not sufficient funding to do all projects well, we would all benefit from fewer projects, done well.

Again, as one of Philadelphia's oldest communities and as close neighbors to the Independence National Historical Park, we Quakers look forward to working with you and your staff to find new ways that will make the past, including the Quaker heritage of this area, more accessible to present visitors to Philadelphia.

Sincerely,

Martha Bryans

Martha Bryans, Clerk
PYM Philadelphia Historic
District Task Group

cc: Martha Bryans, Clerk, Philadelphia Yearly Meeting
John Caughey, Clerk, Philadelphia Yearly Meeting
Thom Jeavons, General Secretary, Philadelphia Yearly Meeting
Friends of Independence National Historical Park
Robert M. Brasler, National Constitution Center
The Junior League of Philadelphia
Karen Butler, Historic Philadelphia, Inc.

HE/pa

COMMENTS

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
31513 Walnut Street
Philadelphia, PA 19106

IN REPLY, PLEASE RETURN TO:

D18 (INDE)

NOV 07 1995

Mr. Alan C. Johnson
Alley Friends Architects
309 North Front Street
Philadelphia, Pennsylvania 19106

Dear Mr. Johnson:

Thanks for participating in the recent public meetings for the General Management Plan for Independence National Historical Park and for testifying on what is unquestionably the most imaginatively presented proposal we have seen in the three years of the planning process.

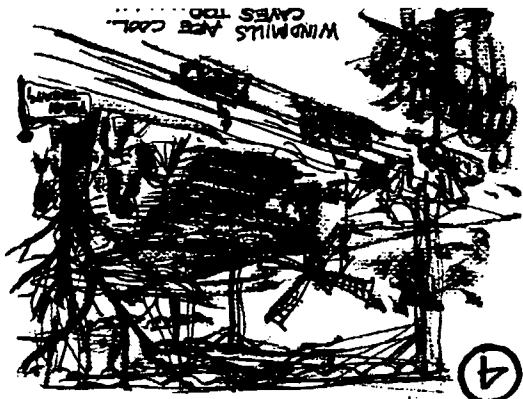
While the reconstructions and fabrications you have conjured are not appropriate for a national park, and in fact, would be prohibited by law and policy, I think you may have an exciting and viable solution for Penn's Landing. I hope that you'll circulate your proposal widely. And I wouldn't mind taking one of the first rides in the commemorative hot air balloons!

Sincerely,

Martha B. Atkins
Superintendent

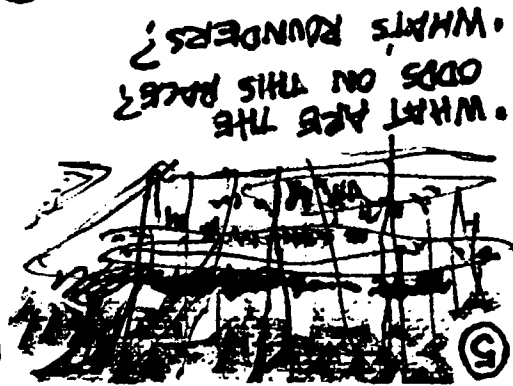
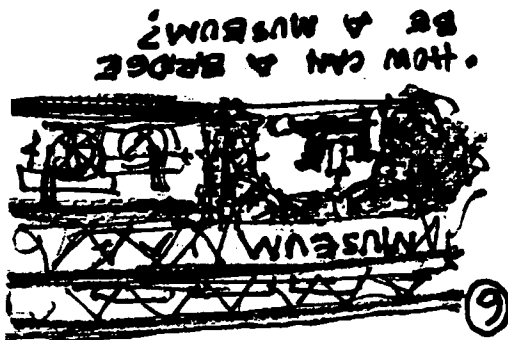
RESPONSES

COMMENTS



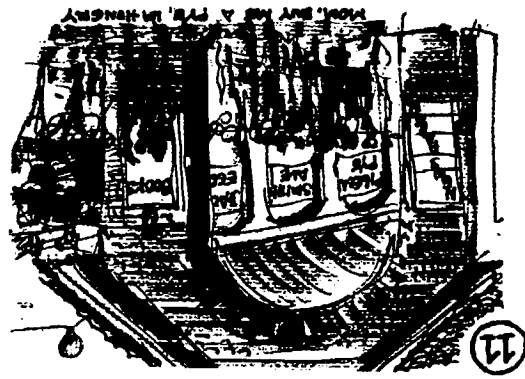
RESPONSES

COMMENTS



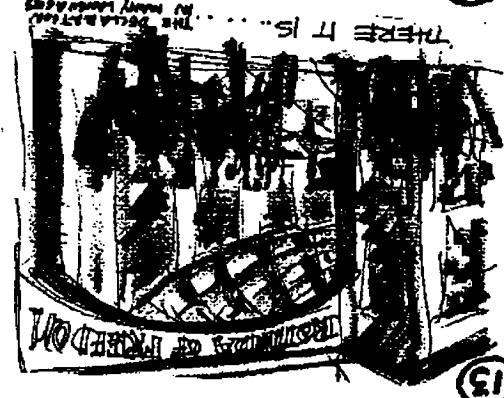
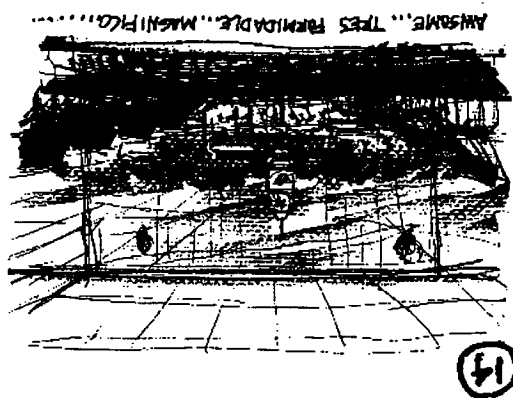
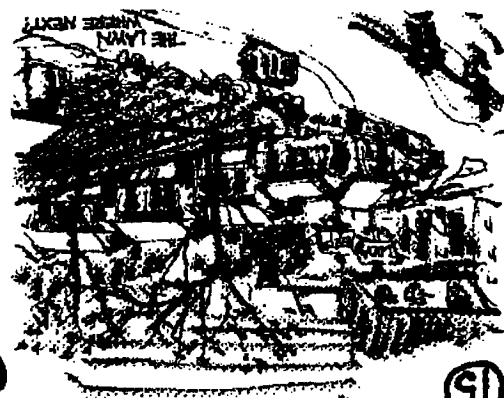
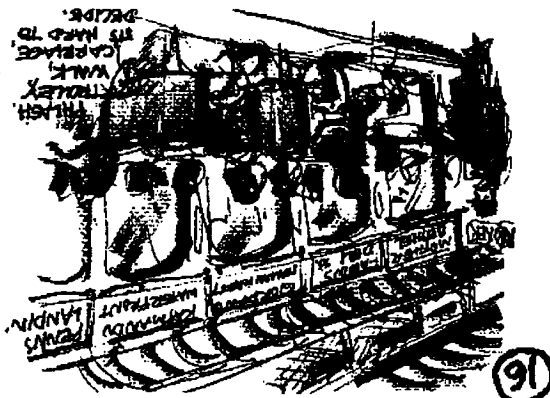
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RESPONSES

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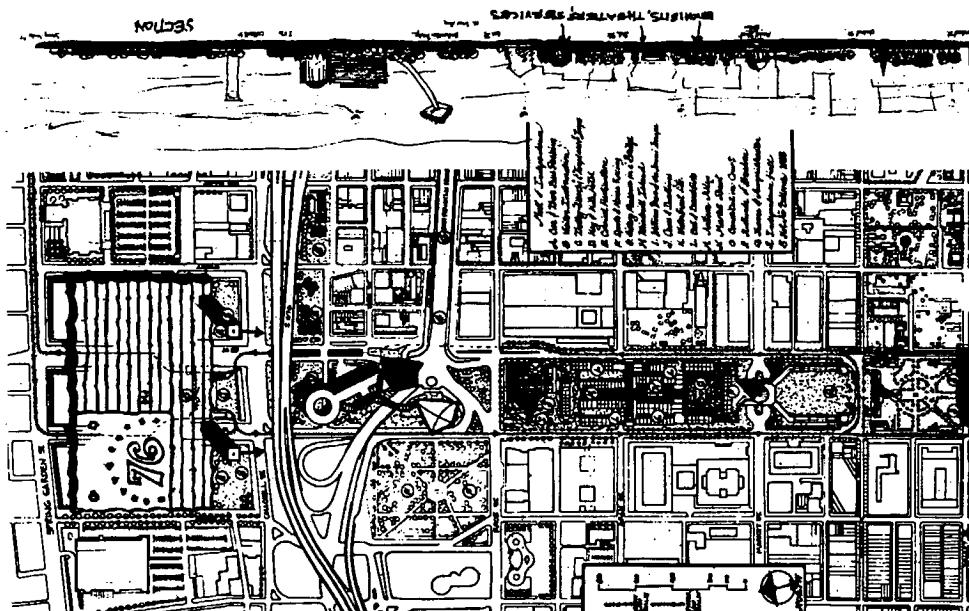
RESPONSES

COMMENTS



MOM, DAD,
IT'S A MIDDLE
CITY, LOTS
CO. BROTHERS,
COOL!


COMMENTS

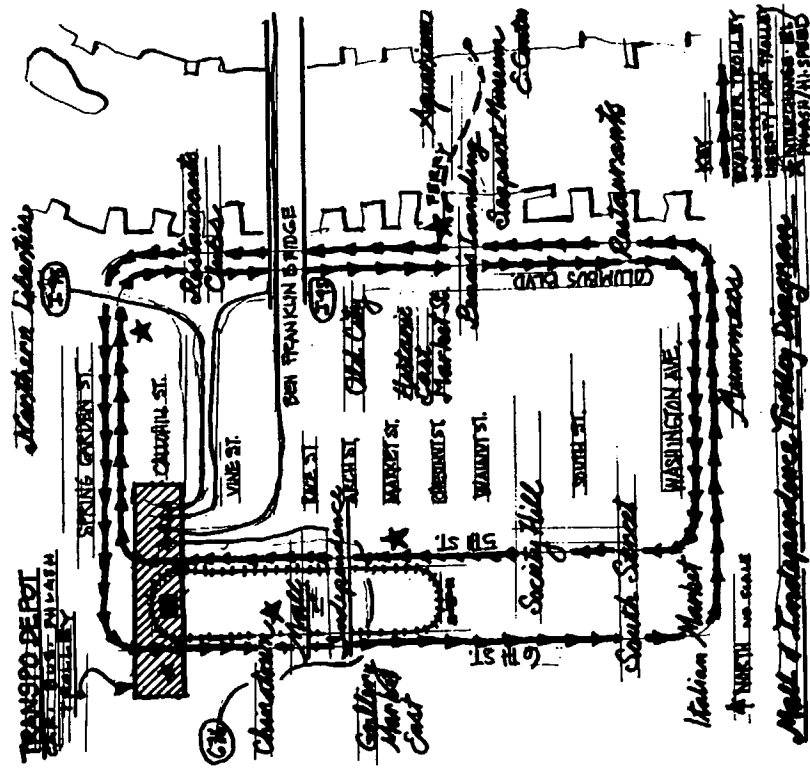


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(C) 1940 ALLEY FRANKS ARCHITECTS

RESPONSES

COMMENTS

		ALLEY FRIENDS ARCHITECTS	
ALAN CHODS WISNIA, P.A. DIRECTOR P.A. NO. RA-008845-X N.J. NO. AJ 006097		308 N. FRONT ST. PHILA. PA. 19106 215-922-3554 FAX # 922-7742	
ARCHITECTURE INTERIOR DESIGN AND PLANNING			



RESPONSES

COMMENTS

MALL OF INDEPENDENCE
©1989 Amy Francis Architects

The following is a young girl's description of her first visit to Philadelphia. Her parents visited Philly many years ago when the Liberty Bell was in a glass box and the mall was an unimproved wasteland.

OK, so my younger brother is a jerk, but this time I think he's got it right. We're driving to see the Liberty Bell and he said, "Oh Boy, is this going to be boring or what?" Mom and Dad say history is cool. What do they know about cool? (And so the typical family starts its short stay in the City of Brotherly Love. What they don't know is that the Independence Mall has been transformed into Colonial experiences, educational fun, historic thrills, as well as a relevant background for America's shinnies).

Fred Dad parked the car in a giant garage and bus depot camouflaged as an enormous (16 football fields) American flag. Inside, information desks were everywhere. Our Guide suggested we jump on the Liberty Loop Trolley and start at Windmill Island.

We didn't have time to stop at the Colonial Gardens or the Pennsylvania History Museum in a bridge. On the way we saw the Kim & Key Hotel and Colonists playing Cricket rounders and Lacrosse. The Conductor announced, "Horse races begin at 3 p.m.; last bets must be placed by 2:30."

The Windmill and the Caves where early colonists lived were cool. My brother liked the Leni Lenape Indian Village and the giant elm where Penn signed the Peace Treaty. Nearby, a Colonial house was under construction. Just behind was a bustling waterfront (real water) with shipbuilding and taverns everywhere! Dad said we might come back later and I could have a Shirley Temple, whatever that is.

As we moved up the gentle banks of the river (no steps), Artisan Alley came into view. Along the street, everyone was busy making things -- glass bottles, silver spoons, furniture, toys. I helped make wax candles. This place isn't that boring!

Around the corner was the Market with all kinds of food, books, and gifts. Mom and Dad went shopping while my brother and I had lunch. He had Pigeon Pie. Yech! During lunch, a summer shower passed over. We would all have been soaked, but the mall had a retractable glass roof which closed and protected us. Awesome!

We could hear the Free Speech dude a block away. My Mom said he was practicing one of his Constitutional rights. My knucklehead brother said, "Does that mean you don't have to pay for talking?" After a few stops at the Constitution Court Exhibits, he got the big picture.

Crossing Constitution Square everyone quieted down except my brother who, as we turned the corner, shouted, "There it is!" At the Roundabout of Freedom our guide showed us the Declaration of Independence in lots of languages and suggested we touch the Liberty Bell. Wow!

Beyond was a giant green lawn (Dad called it an amphitheater) with Independence Hall in the center. After a tour, Mom and Dad were pretty tired and wanted to go back to the hotel. But, little brother said, "This town is cool. Let's go exploring." Fortunately, the Liberty Loop Trolley continued as the Explorer Loop Trolley and we got to see Society Hill, South Street, and the Waterfront. Mom and Dad got to sit back and relax. The trolley loop took us back to the Flag parking garage.

"Can we stay another day in Philly?" Mom: "Well, we made a list of things to do. The Seaport, Betsy Ross, Dave & Busters, Colonial Sports, and we want to go on the hot air balloon." Dad: "Next time!"

Actually history is cool, in Philly anyway!

P.S. A short time later, Dad had to go to Philadelphia for business and brought all of us along. We stayed in a Bed and Breakfast adjacent to Anasay Alley. It was so convenient we left our car at the Flag and just used the trolley which stopped outside our door. We did all the things on the old list and more. We had dinner at the Penny Pot Tavern. Mom and Dad had Smith's 1774 Ale, and I had a Shirley Temple. After dinner my brother made a new list: The Aquarium, The Flyers.....

COMMENTS

WALLACE ROBERTS & TODD

Environmental Planning
Urban Design
Landscape Architecture
Architecture

September 27, 1996

Ms. Martha Atkins
Superintendent
Independence National Historical Park
National Park Service
313 Walnut Street
Philadelphia, PA 19106

Dear Ms. Atkins:

The National Park Service has demonstrated in its revised plan for Independence National Historic Park that public input can contribute to a better solution. In its broad conceptual framework, Alternative E1, the preferred alternative, provides an opportunity to create an exciting transformation of the Park to a place that is both beautiful and enriching for the visitor.

The plan does not guarantee this, nor will it happen unless the next steps are undertaken with more specific analysis of service requirements, functional relationships and, most important, a vision for design that embraces all structures and open space. Traffic and parking requirements have not been satisfactorily resolved. It is my opinion that the second block should not have the central space given to stacking, loading and unloading buses which will inevitably cause pollution and safety hazards. These functions should be accommodated on the peripheral streets leaving the central space entirely to pedestrians. A thorough review of projected visitations and a study of pedestrian movement patterns through the park is essential to make this block function and give delight to visitors.

The second block has some serious impediments to its development which must be addressed before building locations are finally fixed. In particular, a major underground electric substation is located under the mall at 6th and Arch Streets which may preclude that location being allocated to the Constitution Center. The future of the existing park garage, which has major undetermined defects, is also of paramount importance both in

260 South Broad Street
Philadelphia, PA 19102-5075
215 732 5215
215 732 2551 fax

Coral Gables, FL
San Francisco, CA
San Diego, CA

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
313-315 Walnut Street
Philadelphia, PA 19106

IN REPLY, PLEASE REFER TO:

NOV 27 1996

D18 (INDE)

Mr. William H. Roberts, PASLA
Wallace, Roberts & Todd
260 South Broad Street
Philadelphia, Pennsylvania 19102

Dear Mr. Roberts:

Thank you for your letter of September 27 and for your continuing interest in planning for the park. I appreciate your recognition of the fact that a General Management Plan is a broad conceptual framework rather than a detailed plan.

We share your concerns over the feasibility and best solution for handling buses, as well as the constraints that may be offered by the underground parking garage and electrical substation. We expect more detailed information from the Philadelphia Parking Authority and PECO shortly. Naturally, we intend to solve these and additional major issues before detailed design of any structure can begin.

Three years of public discussions produced no compelling alternate future for the third block of Independence Mall. At this time, no reason presents itself to abrogate National Park Service policy regarding commercial uses on park lands. For purposes of comparison, I note that if utility or level of use were the most important measures, Franklin Square and much of Fairmount Park would be sold off for development immediately. Yet the community continues to believe that park land and open space have their own intrinsic values. However, as the second block of the mall is redeveloped, and if other conditions change to the west and east of the mall, new and better solutions may become apparent.

Sincerely,

Martha B. Atkins
Martha B. Atkins
Superintendent

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Ms. Martha Altzen
September 27, 1996
Page 2

WALLACE ROBERTS & TODD

terms of parking supply and the impact it has on ramps, the deck or plaza, and the arcades along 5th and 6th Streets. These and other functional issues must be addressed in a comprehensive urban design and planning framework before any assignment is given to design an individual building for the sake of expediency. Such detailed work is a normal part of the NPS planning process. It should be launched immediately so that we can open a dramatically improved mall as the central focus of the Nations Celebration of the Millennium.

Consideration should also be given for a more flexible position with respect to permitted uses on the northern block - between Arch and Race Streets. Although this is a pleasantly landscaped park, it is not heavily utilized nor will it be unless other uses attract visitors to the area.

The next steps are important for the National Park Service, the City, The Pew Charitable Trust and for those who intend to invest substantial public and private funds in this planned improvement. Along with the comprehensive study of issues mentioned above, a clear and compelling vision of the physical design is essential. The task to take the National Park Service's proposal to the next stage must be assembled from the best talent in the country to ensure that the solution is exemplary and a testimony to our heritage.

Sincerely,



WILLIAM H. ROBERTS, FASLA
Partner

WHR:pf

COMMENTS

VENTURI, SCOTT BROWN AND ASSOCIATES, INC.
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Received DSC-PM

OCT 23 1996

October 11, 1996

Martha B. Alkens
Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, Pennsylvania 19106

Dear Martha:

Congratulations on the cordial public reception of the revised Preferred Alternative for Independence National Historical Park. Dan McCoubrey and I attended the meetings.

I am writing to point out that on the Alternative E-1 plan the parking garage under the second block of the Mall is inaccurately shown at the center of the block. Enclosed for reference are a partial, enlarged plan of VPS Alternative E-1 from page 9 of the Independence newsletter, and a partial site plan from one of our reports. They are to the same scale.

As indicated on the VPSA drawing, the parking garage is closer to the northern end of block 2. If the garage remains in its present location, the space north of it will be inadequate for the three functions proposed in the revised preferred alternative.

I hope this information helps finalize the General Management Plan.

Sincerely,

Heather Clark
Heather Clark

Enclosure

cc w/enc.: James Pickman, Esq., The Pew Charitable Trusts

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

NOV 3 7 1996

D18(INDE)

Ms. Heather Clark
Venturi Scott Brown and Associates, Inc.
4236 Main Street
Philadelphia, Pennsylvania 19127-1696

Dear Ms. Clark:

Thank you for attending the recent public meeting for the General Management Plan for Independence National Historical Park and for your letter.

Although the map in the newsletter intended to show only the general location of the underground parking garage, in keeping with the general nature of all the elements of the proposal, we appreciate receiving the more detailed information. We would very much appreciate receiving all the information you collected on the parking garage as many of the original plans for it are not contained in our archives.

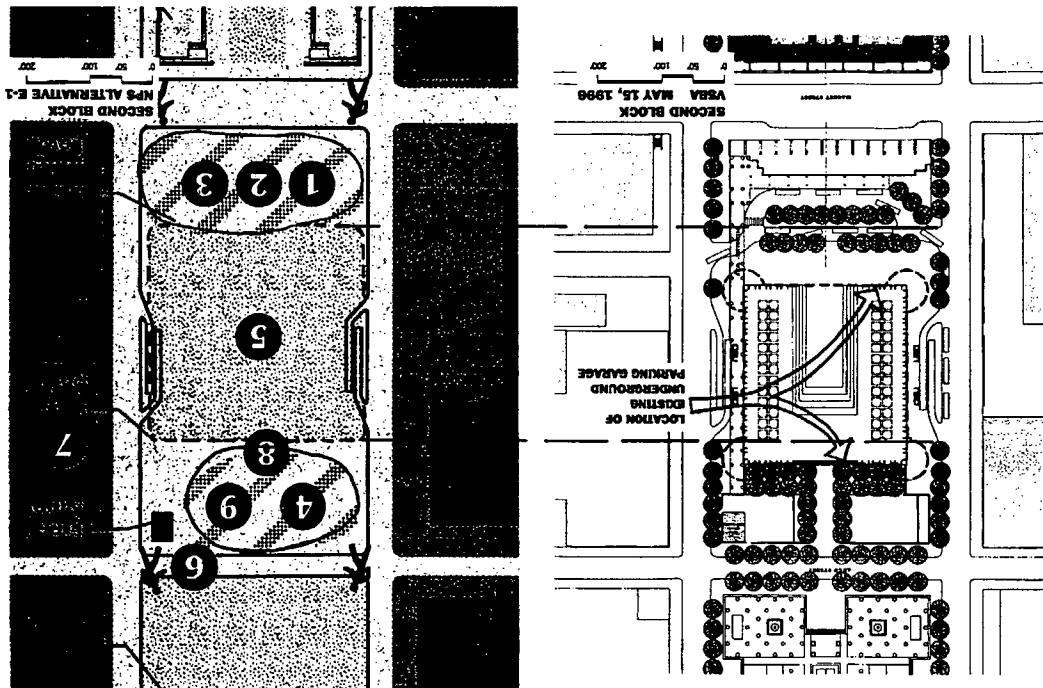
The adequacy of the space north of the garage for the proposed functions depends on the ultimate size of those elements, on the potential for regrading the surface, and on the potential for enhancing the load bearing capacity of the existing garage structure. At this point, these questions remain unanswered.

Sincerely,

Martha B. Alkens
Martha B. Alkens
Superintendent

RESPONSES

COMMENTS



COMMENTS

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Ann Thonbridge A.A.

John Baskin A.A.
Ronald Edlin A.A.
John Hunter
Timothy Kearney
James Kessler A.A.
Thomas R. Kelly A.A.
Richard Stokes
Nancy Rago Traylor A.A.
James Wallace A.A.

Martha B. Aikens
Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia Pennsylvania 19106

RE: Independence National Historical Park, General Management Plan

Dear Martha:

Thank you for inviting us, via Deirdre Gibson, to submit material from our Planning Studies for inclusion in the Comments section of the Final General Management Plan (GMP) for Independence National Historical Park.

As you know, Venturi Scott Brown and Associates was retained by the Pew Charitable Trusts to develop conceptual plans for Independence Mall and preliminary designs for a Gateway Visitor Center sited on the Mall. Working closely with the National Park Service, representatives from the City, the design community, and other stakeholders, we prepared analyses of urban design issues and developed design principles that were explored in a series of options for the Mall and the Visitor Center.

In the end we presented two schemes -- Option A and Option B -- and strongly recommended Option A. Option A sites the Visitor Center along the south side of Market Street on a redesigned Block 1, with accommodation to commercial activity on 5th Street and bus drop-off on Block 2. Option B sites the Visitor Center on Block 2 along the north side of Market Street leaving Block 1 as is. As explained fully in our submitted material, we feel strongly that Scheme A holds great promise for improving the context of Independence Mall and providing a memorable visitor experience.

While these studies were integral to the process of developing the GMP, they cannot, according to Park Service protocol, be included in the Management Plan. It was suggested that the material be submitted as Comments on the GMP. However, we do not think it appropriate to include material so integral to the process as Comments. Instead, we submit: 1) this letter, 2) the enclosed letter dated October 11, 1996 clarifying the location of the parking garage below Block Two, and 3) Redesign of Independence Mall With Visitor Center: VSB&A's Preliminary Analysis and

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Martha B. Aikens
Page 2

and illustrated
Conceptual design: Scheme A* written by Robert Venturi -- all to be included as Comments on the GMP. A

Those interested in reviewing the studies, specifically the Task One report dated March 1, 1996 and the Task Two report dated April 26, 1996, can find them at the Independence National Historical Park offices, 313 Walnut Street. We have enclosed additional copies of these reports.

Sincerely,

Denise

Denise Scott Brown

DSB/hhr

Enclosure

cc w/enc.: James Pickman, Esq.

COMMENTS

RESPONSES

REDESIGN OF INDEPENDENCE MALL WITH VISITOR CENTER: VSBA'S
PRELIMINARY ANALYSIS AND CONCEPTUAL DESIGN: SCHEME A

© Robert Venturi
September 1996

What follows is a description of the VSBA Scheme A design -- a design that respects and accommodates THE DELICATE QUALITY OF THE 18TH-CENTURY INDEPENDENCE MALL and embraces at the same time 21ST-CENTURY ELECTRONIC WHAMMO -- WHAT MAYOR RENDELL CALLS SIZELE.

ACKNOWLEDGING THE GENIUS OF PENN'S GRIDIRON PLAN

First in any analysis of the Mall problem and any redesign of it comes the relevancy of William Penn's gridiron plan as the original and essential setting for the Pennsylvania State House that was to become Independence Hall. The genius of Philadelphia's gridiron plan (which was to become the prototype for the American city) lies in its elemental juxtaposition -- that of explicitly varied configurations of building types and forms evolving optionally over time that are juxtaposed within an original street layout that is essentially consistent in its geometric configuration. Here is exemplified order combining with individuality, simplicity accommodating complexity, an integration of American organization with American pragmatism -- and perhaps, within Philadelphia, of Franklinesque pragmatism with Quaker tolerance.

It is important further to acknowledge characteristics and implications that derive from Philadelphia's generic gridiron plan:

Streets are essentially non-hierarchical in terms of their layout and their widths -- with the exceptions of Broad and Market Streets and some alleys -- exceptions that prove the rule.

And this essentially non-hierarchical street system as it combines with architectural variety creates an overall order which is egalitarian -- where an individual building derives its standing not from its relative or unique position but from its inherent quality: a deli in theory can sit across from the mayor's house.

And streets are open-ended -- with City Hall straddling Broad and Market as the other exception that proves the

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RESPONSES

rule -- no ducal palace will terminate an axis and an eternal frontier is implied via open-ended streets and via the evident horizon that can accommodate optional growth and eternal opportunity -- and the city thereby is an eternal fragment -- a whole never complete and ever expensive.

And lastly, individual buildings within the grid system and along the street are approached obliquely and perceived close-up -- with again a vivid exception -- those facing the occasional square -- but even these are seen, if not obliquely, from relatively close-up.

In this outline of determinants and characteristics of VSBA's preliminary conceptual Scheme A, much of which we have not been able to make public, we shall refer as well to the serious and crucial urban analyses that VSBA have made and that have created a realistic basis for this design.

1. THE GATEWAY VISITOR CENTER AS AN EDGE TO A HALL-FRIENDLY SQUARE: The Gateway Visitor Center building via its location and extent along the north edge of the first block and via the intimate scale of its south facade creates a 20th-century configuration of space and scale appropriate as the setting for the 18th-century facade of Independence Hall.

2. DOWN WITH VITIATING VISTAS: THE GATEWAY VISITOR CENTER AS A VIVID DEFINER OF MARKET STREET: The urban and functional job of the building for the Gateway Visitor Center on the north side along Market is different from its job on the south side toward the Hall: it is a lamb on the south and a lion on the north! This same building via its location and extent immediately along the south side of Market and the big scale of its arched facade along Market works to reestablish urban formal continuity, amenity, and civic quality along this side of Market as it connects the newly vital zone toward the west on Market and the Old City District toward the east.

3. DOWN WITH VITIATING VISTAS: THE GATEWAY VISITOR CENTER AS A VEHICLE FOR 21st-CENTURY NATIONAL-SCALE IMAGERY: This urban-spatial re-accommodation and revitalization of Market within the gridiron plan is combined with a vivid symbolic element -- a mural-fringe within the glass-faced gallery extending the length of the block -- facing and readable from the street. Its medium exemplifies contemporary electronic technology, that of LED pixelated signage promoting moving imagery whose dynamic brilliance accommodates a hype sensibility characteristic for the 21st century. And it promotes for this a place -- proximate to but perceptually separate from the gentle and precious Independence Hall -- a

RESPONSES

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civic gesture involving iconographic imagery -- or images -- that embrace dimensions, decorative, symbolic, narrative, and informational -- that embrace an iconographic dimension that is memorable, indeed unforgettable, at a national and international scale for visitors and tourists, national and international. This great sign, integral to its architecture and its urban setting, should achieve a symbolic brilliance equivalent to that of the Statue of Liberty in New York Harbor. To create 21st-century civic wherewithal we need the grand LED mural that variously narrates and symbolizes and informs, that does not intrude on the 18th-century scale of the Hall, and that produces an image -- or images -- you'll never forget -- a Statue of Liberty that is within a Philadelphia mid-city context that can be loved by kids of the 21st century. And it constitutes an image that reads night and day -- for a 24-hour architecture. One of our critics has referred to a demeaning message board -- No, this is a mural with dimensions civic and aesthetic in a real medium for now.)

4. CIVIC-ICONOGRAPHIC PRECEDENT: A distinct precedent for our civic-scale pixelated LED mural that relates for the late 20th century to the urban context of Market Street and to the city and region as a whole is the glorious mosaic -- whose tesserae correspond to our pixels -- that of the early 20th-century mural by Maxfield Parrish in the lobby of the Curtis Building two blocks away.

5. THE GATEWAY VISITOR CENTER AS A GENERIC BUILDING AT HOME IN ITS MARKET STREET CONTEXT: It is important to emphasize the Gateway Visitor Center as it is seen along Market Street is not a free-standing building -- it is not set back, it sits along the building line, along the sidewalk on the street, and as it extends the whole length of the block it fits analogously and intimately within the texture of this commercial part of Philadelphia. This, along with its exterior arcade and interior gallery extending the whole length of the block, makes this building a part of the city outside -- a part of the pedestrian-vehicular dimension of the city. And inside, the exterior-scale gallery with its national-scale mural works as an urban circulation and meeting place with, along its south side, a series of contrasting low and small-scale niches richly accommodating within a flexible generic order varying uses and services that can change over time. The generic design of the visitor center as a whole combines a constant civic space with varying imagery on its vaulted ceiling along with a linear series of flexible niche-like spaces that accommodate changing uses over time.

6. THE LIBERTY BELL IN A NEW SETTING: The Liberty Bell in Scheme A is placed within the Visitor Center building in a part of it that is appropriately separate and special -- and

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realistically accommodating to lines of visitors -- facing the Hall and visible from it on the south, on axis with the Hall and visible as silhouette from the north on Market.

7. A CONTINUITY FOR MARKET STREET ON THE NORTH: Across from the building on Market is a series of niches whose walls are the same height as the facade of the building. These walls are perpendicular to the street and as they could create niches 13 in number, open back and front and at the sides at pedestrian level, they could commemorate the first states via iconographic inscriptions on their surfaces and on the wall in back. These open niches which make for a kind of intimate park at close-up can also work as space for mobilizing extra-large groups of visitors. But most important, when perceived in perspective from up or down Market Street, the configuration of the perpendicular walls reads as a more or less solid element lining Market and thereby complementing the building across the street and promoting on this side spatial and formal continuity.

8. REALISTIC PARKING AND BUS CIRCULATION -- SAFE, COMPREHENSIBLE, AND AMENABLE: Very important, buses and cars become an inherent and unabashed element of this plan; in order to make this place work as a national/international tourist center, accommodation for auto parking and bus arrival and departure must be explicit, perceptible, and comprehensible in its configuration and safe and amenable as it is used. And it must work within the context of the local street system and be not oppressive in its urban-aesthetic effects. Our scheme in its preliminary stage assumes realistically and economically that the present underground auto parking system can be and will be renovated and re-used for the short run. At the same time, not being axis-addicts, we can face the bus issue and put it where it belongs, off now-potentially beautiful Philadelphia streets and within a block -- that is, on the second block behind the series of 13 niches and in front of the existing below-grade parking. This place works for bus entry from Sixth and exiting onto Fifth. Also there is plenty of precedent for such urban places being amenable with trees and safe for pedestrians. This location important function within the vehicular and pedestrian circulation system of the place as it becomes central and unobtrusive at the same time. It works also as a place from which pedestrians easily and smoothly circulate to and from the Visitor Center building along Fifth and Sixth Streets.

9. PEDESTRIANS CIRCULATE IN THE PHILADELPHIA WAY: Very important in the design of scheme A is the redirecting figuratively and literally of pedestrian circulation from the central axis in mid-block to the sidewalks at the edges of

RESPONSES

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blocks. This involves at an aesthetic level a return to the Philadelphia way and it promotes at a practical level a return to pedestrian safety where citizens are expected and encouraged not to cross east-west streets at mid-block where they are expected to perceive the demeaned glory of the Hall but at the corners where William Penn intended them to cross.

10. A PILGRIMS' WAY: This configuration can involve at an urbanistic level a return to streets that are active, commercially viable, and fun to walk along -- this by reestablishing the original width for vehicular traffic on Fifth Street now that buses no longer stop, linger, and pollute there and thereby increasing the width of the sidewalk on the west side for accommodating kiosks or pavilions and encouraging commercial activity. Here you accommodate and encourage retail space that would counteract those street-level fronts that are dry-polite and would, besides creating urban vitality, enhance linkage to neighborhoods beyond. In this way you establish a kind of Pilgrims' Way as you approach the Hall from the north that would conform to a tradition characteristic of approaches to shrines all over -- that make the sanctuary vital and vivid via contrast -- as in the avenue approaching the Piazza of St. Peters or in the markets facing shrines in Kyoto -- where the sacred and the profane can come together -- as order and clutter.

11. RETURN 5th & 6th STREETS TO THEIR FUNCTIONS AS STREETS RATHER THAN AXIAL EDGES: And, as important, through the revitalization of Fifth Street as a major approach to the shrine and as a Pilgrims' Way you make explicit a difference between Fifth and Sixth Streets and by this natural asymmetry you by implication return the context of the Hall from symmetrical-axial to gridiron pragmatic.

12. REESTABLISHING SPATIAL CONTINUITY AND APPROPRIATE SCALE ALONG CHESTNUT: To return to the first block in Scheme A -- at each end of the north side of Chestnut between Fifth and Sixth Streets is a facade whose length extends about one-quarter of the block and whose height more-or-less corresponds to that of the Hall across the street, and whose material and whose ornamental scale correspond generally to that of the Hall. We have shown the facade toward the left to be that of the Free Quaker Meeting House moved from its desolate setting at Fifth and Arch Streets and on the left an Independence Park Institute Headquarters -- but other things can be done to reestablish via this kind of urban gesture the original authentic ease of directional space along this side of Chestnut and to make of the open first block a space which is not a continental plaza.

COMMENTS

RESPONSES

13. AND YET ACCOMMODATING FIRST AMENDMENT DEMONSTRATIONS: The first block now becomes a friendly pedestrian place protected from 20th-century scale Market Street and yet it contains adequate paved space for First Amendment demonstrations within sight of the Bell and friendly, green space to sit as well as gather in -- it isn't a grandiose plaza but a respectful context to accommodate 20th-century crowds, 20th-century browsers, and an 18th-century masterpiece.

14. VITAL URBAN CONNECTIONS: It is significant that a vital historical area will make for vital connections with and contributions to the urban zones around it -- east, west, north, and south -- and at the same time these areas will in new ways contribute to the vitality of this place.

15. GETTING A GOOD START -- REALISTIC SCHEDULING VS. POMPOUS VISIONS: It is important also that the first phase of this plan can happen right away, is not dependent on cumbersome coordination among other governmental or institutional agencies, projects, and processes. And this pragmatic-incremental rather than autocratically-controlled approach to planning leaves options open after a vital initial action -- so that the evolution from 18th-century scale and sensibility to 20th-century scale and sensibility in the next evolution northward -- with that iconographic dash of 21st -- can evolve naturally toward the north into 21st-century configurations with dynamic juxtapositions -- natural and, again, pragmatically vital -- for programs and scales not yet dreamed of in our philosophies: this is the way William Penn worked it with his gloriously not specific -- but generic way. In this context also the Constitution Center can evolve naturally and realistically in terms of its scheduling, location, and size. Let us resist falling into the visionary trap.

16. URBAN FANFARE AND URBAN INTEGRATION: It is significant that this approach makes for a design configuration that integrates with the fabric of the city and does not stand out as a monumental-rural National Park. This is healthy and appropriate for making a vital place explicitly of our city -- and a place densely and realistically accommodating buses, school children, cars, visitors, tourists, citizens, in efficient, comprehensible, and appropriately imageful ways. It is a place also that is at once, local, national, and international in its workability and imagery.

17. URBAN SEQUENCES THAT ARE NOT DICTATORIAL: The job is how to make this a place that is not axially dictatorial or didactically oppressive concerning its sequential order and its interpretive messages -- a place whose messages can be interpreted richly and differently by different individuals in

RESPONSES

COMMENTS

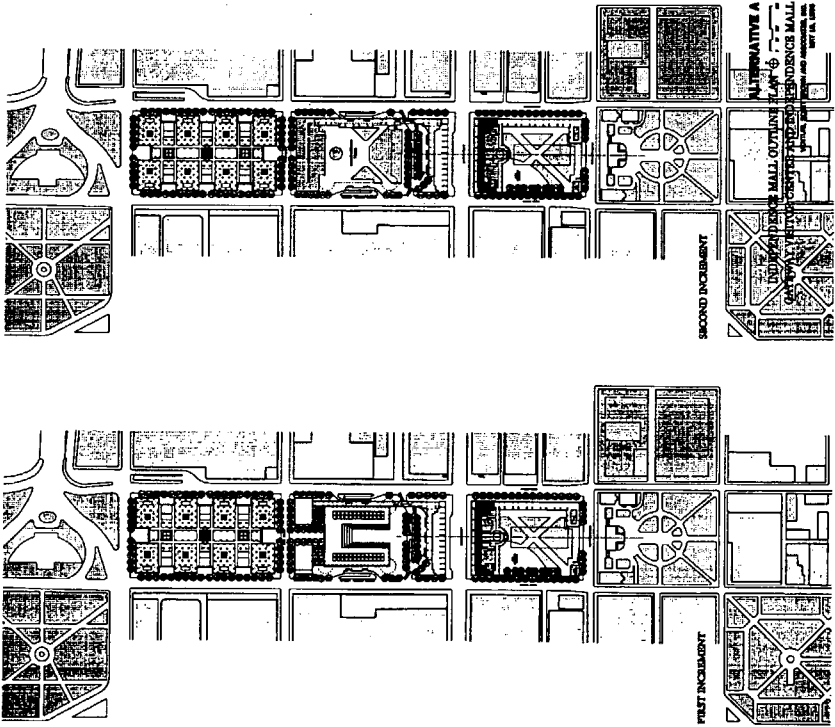
different times in different ways -- it is a place for discoveries and revelations that are not imposed but revealed. But also a place that works in terms of its everyday use, urban amenity, and circulation patterns -- pedestrian and vehicular -- for inhabitants as well as visitors -- so it can evoke the thrill of the special and the thrill of the everyday.

* * *

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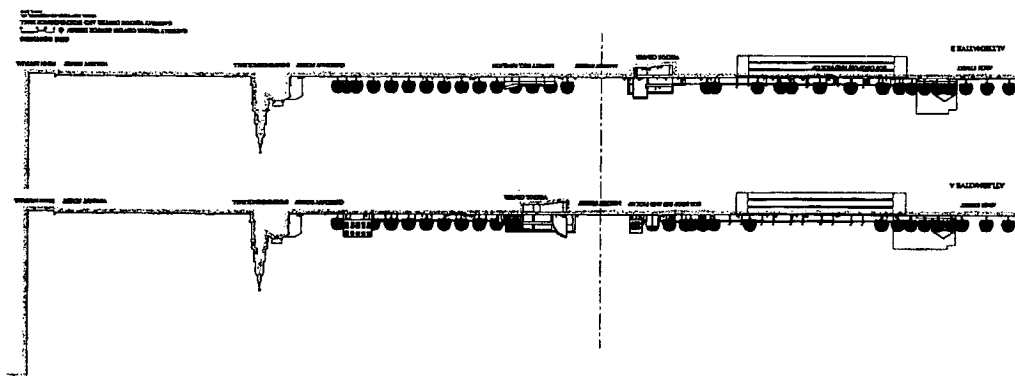
RESPONSES

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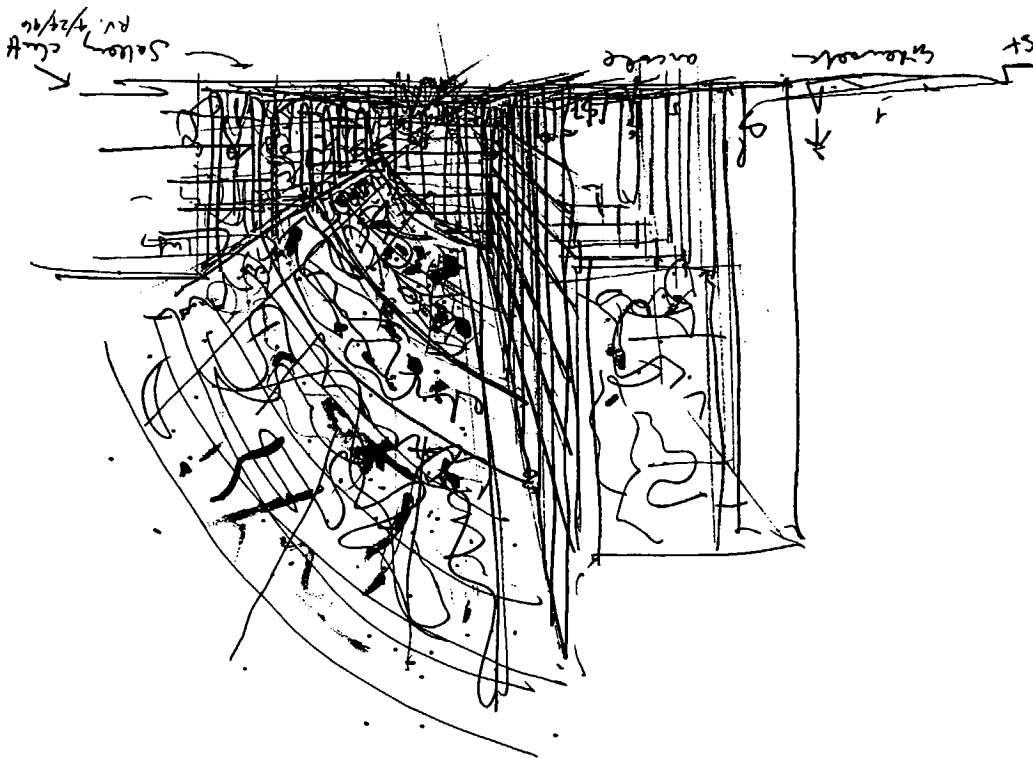
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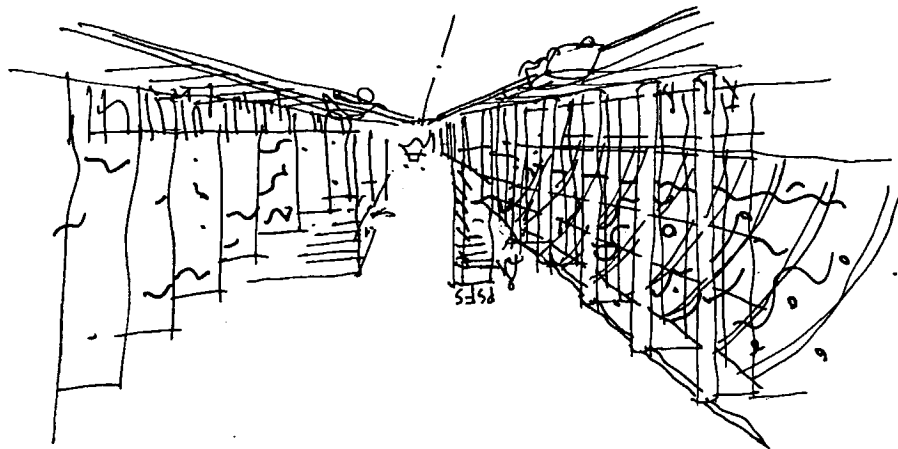
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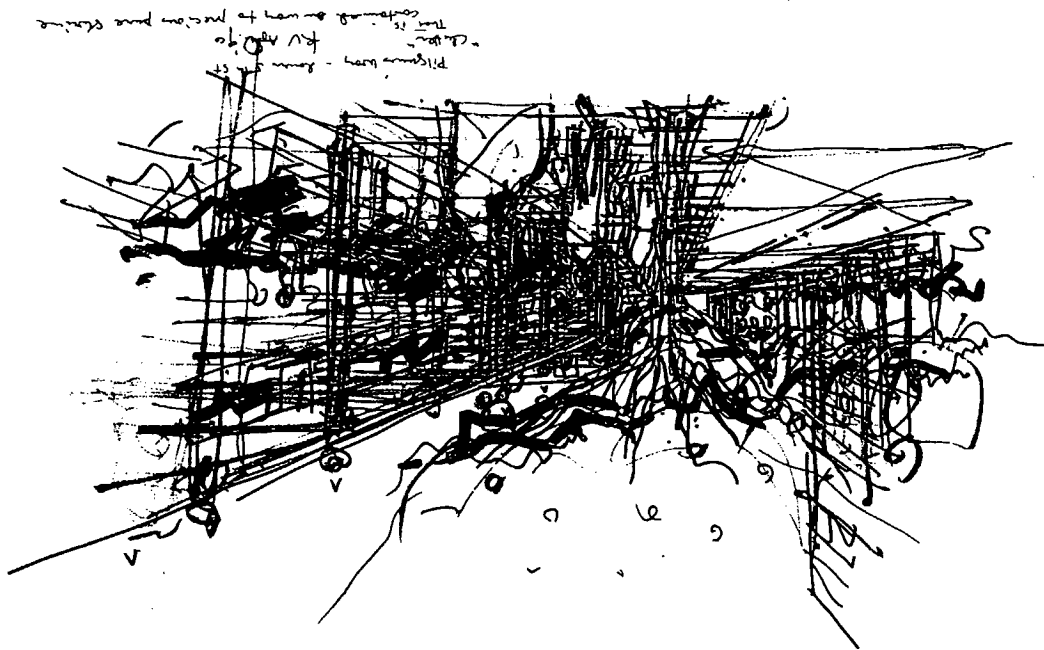
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96 dr rd
mud street



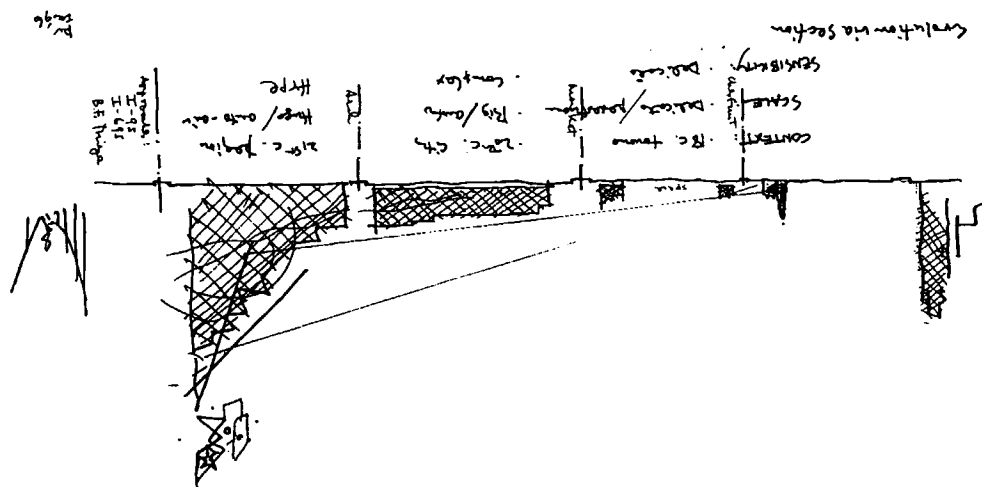
RESPONSES

COMMENTS



RESPONSES

COMMENTS



COMMENTS

Received DSC-PM

OCT 11 1996

Winchell S. Carroll

28 September 1996

Ms. Martha Aikens, Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

Re: Washington Square and its Impact on the GMP for INHP

Dear Martha,

You and your staff are to be congratulated on the quality of the draft GMP and the amount of effort that has gone into it. We are also pleased that the Pew Foundation has chosen to take such an active role. The plan, however, is far from perfect and we are sure that there will be many changes proposed and accepted over the next six months or so.

The American Revolution Patriots Fund is concerned that neither the GMP nor other proposed plans for INHP indicate the impact that the addition of Washington Square will have on the *existing* pedestrian traffic patterns at INHP. We base this concern on the fact that none of the five proposed alternatives in the draft GMP show any pedestrian traffic flow into Washington Square from Independence Square and appear to deliberately direct visitors away from it (See pages 59,65,72,77 and 86). Our primary motivation has *always* been to encourage all of the visitors to Independence Hall and the Liberty Bell Pavilion to visit the Tomb of the Unknown Soldier of the American Revolution and Washington Square.

We believe that when the reconstruction of Washington Square is complete and the Square's operations are governed by the National Park Service that there will be a tremendous increase in pedestrian traffic between the two squares. This should happen no later than Memorial Day, 1999 and perhaps as early as Veteran's Day, 1998. We believe that there will be a great increase in public awareness of Washington Square thanks to the information provided at the INHP Visitor Center and from the Convention and Tourist Bureau - especially if we are successful in getting a military honor guard at the Tomb of the Unknown Soldier. This would be the case even if none of the other proposed changes at INHP take place. As far as we know the reconstruction of Washington Square is the only portion of the plan that is actually funded and scheduled.

We would like to know more about your plans to promote pedestrian traffic to the Tomb of the Unknown Soldier. We would like some assurances that the other stakeholders in the GMP are aware of the significant changes that the completion of the restoration of Washington Square in 1998/99 will bring.

Yours, *Winchell S. Carroll*

American Revolution Patriots Fund
Independence Hall Preservation Fund
Friends of Independence National Historical Park
Pauli Battlefield Preservation Fund
Pennsylvania Society of Sons of the Revolution
Philadelphia-Continental Chapter - S.A.R.
Society of Mayflower Descendants in Pennsylvania
Sons of Union Veterans

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
313-315 Walnut Street
Philadelphia, PA 19106

IN REPLY REFER TO:

D18 (INDE)

NOV 07 1996

Mr. Winchell S. Carroll

Dear Win:

Thank you for your recent letter on the General Management Plan and for your continuing interest in and support for Washington Square.

I have reviewed the pages you have cited from the 1995 draft General Management Plan. I believe that the arrows designating pedestrian flow are poorly placed and misleading. They will not appear in the final plan. I can assure you that it is our intention that Washington Square and its resources will be fully represented as a significant part of Independence National Historical Park. We want visitors to visit the square and comprehend its stories. We will help visitors to find the square through changes to orientation programs and materials and through a system of discrete signage that will be developed for the park as a whole. Because these changes will happen regardless of the outcome of the General Management Plan, they have not been referenced in the plan.

I, agree, that there will be a large increase in foot traffic between Independence and Washington Squares. With increased use, midblock crossings could become a concern here, as they are in other parts of the park. We expect that most visitors will continue to walk through Independence Square and cross at the intersection of Sixth and Walnut Streets, however. A simple retiming of the traffic light at the intersection could make a safer situation for pedestrians. By copy of this letter, I will alert Mayor Rendell to this concern.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

COMMENTS

Received DSC-PM

LEATHERBEE AND ASSOCIATES ARCHITECTS AND PLANNERS
1504 SOUTH STREET, PHILADELPHIA, PA 19146 215-645-6910 FAX 215-645-1551

WILLIAM B. LEATHERBEE AIA

October 4, 1996

Superintendent Martha Aikens
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

RE: Preferred Alternative Design Plan for Independence Mall

Dear Ms. Aikens:

Independence Mall is a space that needs reinterpretation and redesign. That seemed to be the general agreement of the Park Service and those at the hearings held by the Park Service on September 24 and 25.

What was missing though from those hearings was a lively discussion of the importance of the National Constitution Center, its location as a symbol of that importance, and the idea of making an historical and symbolic place in the Mall.

Independence Hall, the Declaration of Independence and the Liberty Bell deserve to be, and have been, celebrated and revered by their placement and accessibility to all who come to Independence National Park. They represent the birth of our nation, but they are static icons in that they are specific to a time and place in our history.

The Constitution, on the other hand, is a dynamic document, that established the principles of how our government would be formed, that has evolved through many amendments, and that continues to be interpreted and reinterpreted through the present into the foreseeable future. It has been and will continue to be an example and model for modern democracies throughout the world.

The National Constitution Center can document the history of the deliberations that resulted in the Constitution, the raging debates that occurred both during the deliberations and in the press and federalist papers, and the history of the various amendments which shaped our present constitution, which, of course, is the history of the nation itself. Why then should the National Constitution Center be separated from the icons associated with its formation, and relegated to the north end of the Mall "behind" the proposed Gateway Visitor Center?

The Gateway Visitor Center is a place of arrival and departure. It is not a destination. Independence Hall, the Liberty Bell and the National Constitution Center are destinations. In the proposed preferred Park Service plan, to get to the proposed site of the NCC, visitors will have to cross the bus and auto drop-off area at the Visitor

NEW JERSEY

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RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-815 Walnut Street
Philadelphia, PA 19106

NOV 07 1996

D18 (INDE)

Mr. William B. Leatherbee
Leatherbee & Associates
1504 South Street
Philadelphia, Pennsylvania 19146

Dear Mr. Leatherbee:

Thank you for your letter regarding the location of the National Constitution Center (NCC) on Independence Mall.

The focus of the recent public meeting was the plan for the entire mall. The NCC and possibilities for a site on the mall have been the focus of previous public meetings and of extensive public and internal discussion over the past three years. The NCC also has received a great deal of attention and discussion in the press. Concepts and goals for the symbolic importance of the mall itself also have been the focus of past public meetings and of several publications during the planning process. If the public did not comment on these issues during the most recent public meeting, perhaps there is a sense, after 16 public meetings, that enough has been said.

The National Park Service has often stated its position in regard to a location for the NCC. We disagree with the notion of sequencing the movement of a visitor. We believe that in a city, any attempt to control movement or free choice is both counterintuitive and anti-urban. A historic city is a unique collection of buildings, neighborhoods, pathways, sights, and dozens of other attributes that give it a distinctive character. We travel to special cities to experience these attributes for ourselves - if this were not the driving force behind leisure travel, people could simply stay home with a CD-ROM. Similarly, we travel to historic sites to gain direct experience - to walk where both great and common people of the past have walked, and to try to put ourselves in their places. Communities preserve themselves, and the National Park Service preserves and interprets historic sites so that we and our children can continue to experience the real thing.

This philosophy, our experience with what motivates and inspires visitors, and our faith in the intelligence of the public are the driving forces behind the NPS's concept for redevelopment of Independence Mall. We believe that neither cities nor historic sites lend themselves to "sequenced" visiting such as one finds in

COMMENTS

Superintendent Martha Aikens
Independence National Historical Park

October 4, 1996

Page 2

Center. Most likely many visitors will head south to Independence Hall and the Liberty Bell first, and never make it to the National Constitution Center. They will miss a great opportunity for learning more about the world's greatest living document.

According to the proposed preferred plan, the visitor to Independence Hall looks north toward the Liberty Bell and sees what at the end of the Mall? The Gateway Visitors Center and the hustle and bustle of tourists and vehicles moving to and fro! Much more sensible, it seems to me, would be to place the NCC on the north side of Market Street and the Gateway Visitor Center on Arch Street. Then the sequence of movement through the Mall becomes:

The Gateway Visitor Center - the point of arrival, information and orientation, and the point of departure, closest to the expressway system and parking facilities, a building, the main function of which is to move and orient visitors, and which has no symbolic or historical significance. From this functional building the visitor should be able to glimpse Independence Mall to the south.

The National Constitution Center - From the Gateway Visitors Center the visitor, heading south, crosses Constitution Plaza to the NCC, a building containing our most important national document, with exhibits and interactive displays, depicting its history and significance, its differing interpretation over the last 200 years, etc. This should be a building of symbolic significance, facing Independence Hall where the Constitution was created, at the south end of the Mall, with the Liberty Bell, the symbol of independence and freedom, between the two buildings.

Independence Mall can become the nation's most hallowed place, but the National Constitution Center, facing Independence Mall, is needed to make the Mall truly symbolic of the value of our ideals to the nation and to the world. The NCC could even be placed at the end of the first block of the present mall, on the south side of Market Street, thereby creating a space in front of Independence Hall which is more sympathetically scaled to that colonial building and the 18th century city which spawned the nation's independence.

The National Constitution Center is the weakest link in the plan, because it is the most expensive piece (\$75 million), with no foreseeable financing as yet. The importance of its location as an integral part of a dynamic Independence Mall, that not only celebrates our past, but our aspirations and hope for the world, will inspire major gifts and a financing plan much like that which restored the Statue of Liberty.

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RESPONSES

2

a theme park or within a museum. Given excellent orientation, visitors can and certainly will choose routes and destinations for themselves. If the NCC's programs and exhibits are intriguing, visitors will seek it out regardless of its location.

We believe that encouraging visitors to broadly experience the area's resources is in the best interest of the community's cultural institutions and economy. The NCC can best ensure its own financial viability by detouring and adhering to feasible construction and operational projections.

The NCC cannot be considered an introduction to themes and historic resources of the park and city. It will be a wonderful addition to those resources, but it will not supplant them.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

RESPONSES

COMMENTS

Superintendent Martha Aikens
Independence National Historical Park
October 4, 1996
Page 3

Let us now concentrate on what could be the most important and exciting idea for the Mall, the National Constitution Center.

Sincerely yours,

William B. Leatherbee
William B. Leatherbee AIA

WBLJ
cc: The Philadelphia Inquirer
Robert Brassler, National Constitution Center

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COMMENTS

Robert Mitchell Hanna, RA, ASLA
Landscape and Urban Design, Architecture

Letters
Philadelphia Inquirer
P.O. Box 8263
Philadelphia, PA 19101
19 August 1996

Comments:

I have followed the various postulations regarding the fate of Independence Mall with great interest. My own thoughts on the issue are enclosed for your consideration and, if you believe worthwhile, publication.

I am concerned that all Philadelphians and others interested in the future of Independence National Historical Park understand the assets we currently have and how they can be husbanded in the creation of a greater whole. Everyone, it seems evident, is acutely aware of the necessity of getting it right this time around. Being very clear about what, why and therefore in our thinking is critical in that regard. Thank you.

Sincerely,

Robert Mitchell Hanna

Robert Mitchell Hanna

cc: The Honorable Edward Rendell, Mayor of the City of Philadelphia
Mr. Roger Kennedy, Director, United States National Park Service
Ms. Martha Aikens, Superintendent, Independence National Park

324 South 21st Street Philadelphia, Pennsylvania 19103 Telephone: 215 985 1847 Facsimile: 215 985 1825

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

1996 07 19

Mr. Robert M. Hanna
324 South 21st Street
Philadelphia, Pennsylvania 19103

Dear Mr. Hanna:

Thank you for forwarding your letter to the Editor of the Philadelphia Inquirer to me. I do not recall whether it was published, but it provides an interesting analysis of the existing mall, which should be of interest to the public. You may want to refer to the Cultural Landscape Report for Independence Mall, published by the National Park Service in 1995, which presents similar information. While it is now out of print, we would be happy to lend a copy for your use.

Sincerely,

Martha B. Aikens

Martha B. Aikens
Superintendent

RESPONSES

COMMENTS

AN EXTRAORDINARY OPPORTUNITY

In the public dialogue surrounding the planning for Independence Mall and proposed Visitor and Constitution Centers something is missing. Absent in the exchange of ideas is an acknowledgment and appreciation of what is there now. There has been little or no mention of strengthening the very positive qualities that currently exist while mitigating what is worst about the Mall and its artifacts. The Mall is not a blank slate, a *tabula rasa* to be writ upon according to whim or will. Unlike the National Mall in Washington, each of the three blocks north of Independence Hall is the work of an individual designer and, from a formal and functional standpoint, entirely different from the others.

Between Arch and Race Streets, the Mall is the work of Dan Urban Kiley, one of the great, modern American landscape architects. From an intellectual, aesthetic and academic standard, it may one of Kiley's greatest works, a classic of contemporary landscape architecture. For obvious reasons, it never worked and stands abandoned, neglected and deteriorating. At the south end in front of Independence Hall, the Mall is the work of the late George Patton, a distinguished and respected Philadelphia landscape architect. Between these two fine examples of modern landscape architecture, the middle block contains a partially submerged parking garage, ineffectively embellished by architectural gew-gaws and an unattractive, inoperative fountain.

Like the Kiley block, Patton's is symmetrical in plan, but in a far less purist form. Where the Kiley scheme is a uniform grid, the Patton design is composed of three distinct subareas. An ample central lawn paved with peripheral walkways provides a dignified, open setting for Independence Hall and an expansive place to be. The center is flanked by seemingly informal, raised terraces with intimate shaded spaces and generous seating—a Mecca for lunch time workers and tourists alike. A paved plaza on Chestnut Street addresses Independence Hall while affording a place for assembly and the creation of viewing stands. This block is an extraordinarily the public space that works very well. The lack of understanding of, or respect for, this remarkable work is witnessed by the recent removal of the original, harmonious, Patton-designed benches and their replacement with English park benches at the doorstep of our nation's shrine to independence from that country. The Liberty Bell Pavilion, designed by Mitchell/Giurgola, sits, in a not illogical position, opposite Independence Hall. While compromising the Patton design and turning its back to the central lawn, the Bell has unquestionably enlivened the block it occupies. Possibly because of the stark contrast between the historic and cultural meaning of the Bell for citizens and the assertive modernity of its design, the pavilion is not well regarded. Its location, however, has served well for twenty years.

The block containing Independence Hall is a nondescript, but delightfully green and pleasant, extension of the Mall. Surrounding and enclosing the Mall, a diverse collection of buildings ranges from the architecturally significant Bourse to faceless and placeless private and government buildings. Immediately East of the Kiley block, the architecturally undistinguished U.S. Mint is an important tourist attraction. North of Race Street, the urban fabric is rent by the confluence of 195, Vine Street and the Benjamin Franklin Bridge access and egress.

Any evaluation and plan for siting the Visitor and Constitution Centers should clearly explicate, for public consideration, these and other contextual factors. While the original decision to clear the blocks north of the Hall and elsewhere in its vicinity is regrettable, qualities of real value were created. Those qualities, many of which are manifested in the landscape architectural

COMMENTS

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Page 2 of 2

works cited above, should be understood and conserved for future generations. We cannot afford to be profligate with our patrimony.

To relegate the northern block to the status of "open space," only insures its continuing decline and eventual demise. The more synergy that can be created to the north the better—for the life of that block, the Mall and the city. It seems clear that the best chance for preserving Kiley's work will be preserving it in part, relying on the strength of its symmetry and concept to accommodate the uses which can infuse it with life. Very serious consideration should be given to thoughtful and sympathetic integration of the Visitor Center into the block. Certainly Kiley should be consulted for this project. A variety of concessions should serve visitors while attracting a wider clientele. Indoor and outdoor facilities—perhaps similar to those incorporated into Hanna/Olin, Ltd.'s redesign of Bryant Park—would dramatically revive this moribund, but architecturally exquisite, public open space.

The garage block affords the greatest opportunity to effect a quantum improvement of the entire mall precinct. The alternatives are many and include that of keeping the long axis open, as favored by Mr. Bacon, and addressing Vennun, Scott Brown's desire to re-create a more pedestrian and urban scale. As an active link between the Visitor Center in the northern block, the Liberty Bell in its present location, if not its container, and Independence Hall, it presents a rare opportunity to build a Constitution Center that is a world renowned facility in its own right and a nucleus that makes, of the whole, something greater than the sum of its parts.

Although specific issues of programmatic content, spatial requirements, and architectural expression are not clearly foreseeable, the possibilities are exciting. Spatially, the existing parking garage and deck suggest intriguing opportunities. Portions of the Center, lighted from above as at the Louvre or the East Wing of the National Gallery, could be below the deck and provide, in addition to exhibition space, connections to smaller buildings lining 5th and 6th Streets. Large tree wells with shade trees and diverse planting would make this block as inviting as those to its north and south. The central axis could be kept free of large structures, providing continuity between the three blocks. The assemblage of buildings on 5th and 6th Streets could accommodate a diversity of Center activities as well as a small hotel or inn to serve visitors. Market Street, the most problematic barrier between the blocks, could be significantly narrowed. The closing of Chestnut Street, an anti-urban idea, should be dropped.

It is crucial in thinking of Independence Mall that we carefully assess what we have and plan for its future in ways that build on its strengths and overcome its faults. We already have many of the ingredients to create something of great and enduring value for our city, region and nation. The addition of a Constitution Center, well conceived and executed, along with other elements to support and enliven the ensemble, could create the critical mass necessary to provide an unparalleled visitor attraction. To realize the full potential of this incredible resource the northern block must be activated and peopled, the positive qualities of its southern block preserved and rehabilitated and the middle block transformed into a pre-eminent facility for education, scholarship and family enjoyment. Here lies an extraordinary opportunity.

Robert Mitchell Hanna,
Landscape Architect, Urban Designer, Architect

COMMENTS

K KAISERMAN MANAGEMENT COMPANY, INC.
Suite 300, 201 South Eighteenth Street
Philadelphia, PA 19103

Received DSC-PM

OCT 11 1996

(215) 546-2665
FAX (215) 546-6828

September 30, 1996

Martha Aikens, Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

RE: INDEPENDENCE MALL RECONSTRUCTION

Dear Ms. Aikens:

As I indicated when I spoke at the hearing last Tuesday night, I find most of the new proposals for Independence Mall quite exciting. However, I once again urge you to forgo any plan to close Chestnut Street. It is obviously a very unpopular idea and will cause undue stresses on your neighbors in all directions.

I hope you will continue to keep us informed of developments in your schematic designs. Thank you for your concern.

Very truly yours,

Kenneth S. Kaiserman
Kenneth S. Kaiserman

KSK/abz

cc: Kathleen T. Toonjes

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

NOV 07 1996

Mr. Kenneth S. Kaiserman
Kaiserman Management Company
Suite 300, 201 South Eighteenth Street
Philadelphia, Pennsylvania 19103

Dear Mr. Kaiserman:

Thank you for attending the public meeting on the General Management Plan for Independence National Historical Park, and for your letter. The Bourse is an important neighbor for the park.

The National Park Service has proposed closing the 500 block of Chestnut Street to traffic in order to protect the hundreds of visitors and residents who jaywalk there daily, and to protect Independence Hall. Currently, the Chestnut Street Transitway, west of this block, is closed to traffic except for buses and trucks. When it is reopened as now proposed by the city, traffic on this block will increase many fold, and we believe the danger will increase as well. Because it is the role of the National Park Service to protect people and historic resources, we believe that our proposal is a responsible one. Chestnut Street is a city street, however, and the ultimate decision on whether to close the block is the city's.

We certainly will keep you informed of continuing developments.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

COMMENTS

Received DSC:PM

OCT 11 1996

LEON CLEMMER ARCHITECT - HISTORIAN - PLANNER

160 WOODPECKER ROAD, JENKINTOWN PA. 19046 PHONE 215-887-5981
FAX 215-885-6666Philadelphia Inquirer
400 North Broad Street
Box 8263
Philadelphia, PA. 19101
September 30, 1996

Gentlemen,

I wrote to you on the 24th of September about the plans for Independence Park.

Al Holm sent me the full packet of his dreams and plans.

I support Holm's plans and his ideas. I told Al I considered him a genius! Again, I cautioned that he like all the rest today discuss only from 5th Street to 7th Street. The planning for the park does nothing to capture Market Street, Christ Church and Front Street. Something should happen behind Carpenter's Hall, the eyecore of the Visitors Center on Third Street should be replaced and the Exchange Building put to a good use.

We have such a golden opportunity! We should do the whole job and not just a band aid.

We don't need another "Cute" bell pavilion. Holm's bell under the dome on the circular plan of columns would be perfect. His Constitution Center does not block the view, yet he has shown a dramatic setting for all the major features on the cross city plazas. He does not close Chestnut Street. He plans for a grand all'e. Pierre l'Enfant and Thomas Jefferson would be proud of Holm's plan.

Lets do it!

Very truly yours,



Leon Clemmer, Architect
Past President, Carpenter's Company
The Edifice Rex

ARCHITECTURE • PLANNING • HISTORIC PRESERVATION • CONSULTING



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311 315 Walnut Street
Philadelphia, PA 19106

NOV 07 1996

DIS (INDE)

Mr. Leon Clemmer
160 Woodpecker Road
Jenkintown, Pennsylvania 19046

Dear Mr. Clemmer:

Thank you for forwarding a copy of your letter to the Editor of the Philadelphia Inquirer to me.

I am sure that you understand that the jurisdiction of the National Park Service for planning and operating lands and facilities cannot extend beyond the boundaries of Independence National Historical Park. That responsibility is the city's and the community's, with which we have worked to ensure that the "total picture" is understood by visitors. The park's plan addresses actions that will take place within the park.

The Philadelphia City Planning Commission will soon release its plan for the historic area. Other agencies and organizations also are actively developing plans and programs for individual sites and for services in the entire historic area. You may be assured that coordination among the many responsible entities does indeed take place.

Sincerely,



Martha S. Aikens
Superintendent

RESPONSES

COMMENTS

RESPONSES

Received: DGC-PM

OCT 11 1996



LEON CLEMMER ARCHITECT - HISTORIAN - PLANNER

160 WOODPECKER ROAD, JENKINTOWN PA. 19046 PHONE 215-887-5681
FAX 215-885-6666

September 24, 1996

Philadelphia Inquirer
400 North Broad Street
Box 8263
Philadelphia, PA. 19101

Gentlemen,

The comments keep coming. Ed Bacon says "Woodman spare that tree" and ties himself to a tree! Holm says build a park with an obelisk, fountains and what looks like the Grand Federal Edifice in one of his sketches. Holm forgets the Liberty Bell. Greenberger says "Plan the whole park" but ignores the full scope of the Historic Area of early Philadelphia.

I have no doubt that the "experts" from the Park Service will tear down the awful Bell pavilion and build a series of ugly buildings that will interrupt the view of the jewel of the Area, Independence Hall.

John Wanamaker published a book in 1926 calling Market Street "America's most Historic Street". Independence Park's planning seems to forget it. We continue to ignore Washington Square and the Athenaeum. Bulfinches' Exchange Building is deteriorating. We have the worst Visitors Center possible across the street from the great First Bank. The park behind the Second Bank is without merit and relates to nothing. Carpenter's Hall, where they tore down the five story "New Hall" to rebuild a two story replica of the same building has a useless Park behind it where the Howell's Tannery stood in 1767! George Clymer (some sort of a relative of mine), stands in lonely silence across from some fine 18th century buildings that escaped the wrecking ball in the 50's. Poor Ben Franklin's house stand in a location which shows only it's bones to the sky and cannot be found by a tourist from either Chestnut Street or Market Street.

Why can't we pull all this together? Why can't the planners plan from 7th Street to Front Street, from Pine Street to Market Street and to the Historic Christ's Church.

An oversized and yet to be designed Constitution Center does not have to be in the Center of this Park and block the view of America's most magnificent centerpiece. So much occurred in this area! Give me a place to set the "Grand Federal Edifice" in a Constitution Procession Park which would describe the great celebrations of 1787. Today's Edifice belongs to the people of this City but is still in storage 10 years later. The Edifice has no permanent home.

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COMMENTS

RESPONSES

page 2
Independence Park
9-24-98

The Hall, we now call Independence Hall, was built originally across the street from a pond and a park. As Charles Wilson Peale said of the design of the Carpenters Company's Edifice for that great Constitution Procession in 1787, each column (State) stands together carrying the New Roof, the Constitution, in a manner so that no State was before or greater than another.

So should be the Park Planning. All the historic buildings and tourist attractions support the centerpiece, Independence Hall. None are more important than the other and all new buildings contribute to the main theme, that the climax of all the founding father's actions took place in Independence Hall. The Hall should be seen and enjoyed by all from the entire Park.

I am a voice crying in the wilderness. Why can't we, with all the talent of this great City plan for a total picture that tells of those days so long ago when the City was the center of this new experiment in government. We have these precious few remnants of the past. They should be cared for as the jewels they are in a setting that reflects the great events and men and women who founded our Country here in Philadelphia.

Very truly yours,

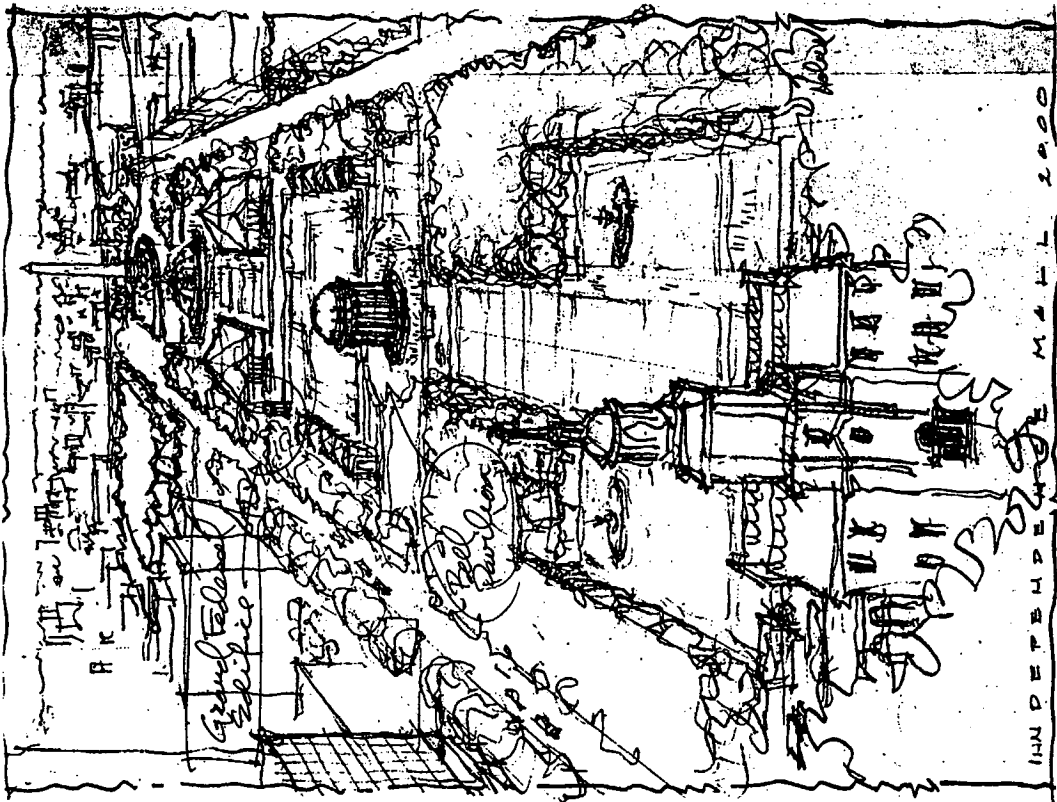


Leon Clemmer, Architect
Past President, Carpenter's Company
The Edifice Plan

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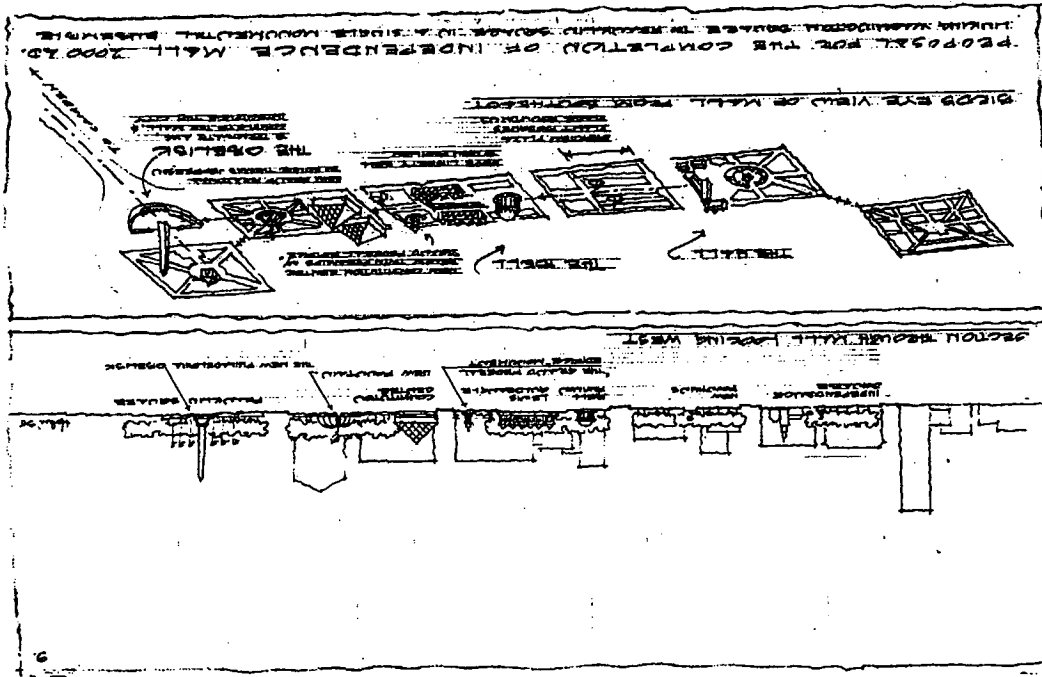
RESPONSES

COMMENTS

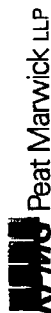


RESPONSES

COMMENTS



COMMENTS



1600 Market Street
Philadelphia, PA 19103-7212

Telephone 215 298 3100
Telex 487362

Telex 215 298 3160

September 13, 1996

Martha B. Aikens
Superintendent
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

Dear Martha:

The Philadelphia Inquirer recently published an excerpt from a commentary I wrote on the design issues facing Independence National Park. I have attached the excerpt, as well as the complete text of the letter, for your review. I had occasion to review materials prepared by the National Constitution Center as a result of a request to review the demand study commissioned by the Center, which I think quite good, as well as conservative in its assumptions.

I should be delighted to discuss my commentary with you. Please do not hesitate to call if you have a free moment (215-299-1619). It would be a pleasure to get together.

Sincerely,

Dianne E. Reed
Enclosure



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RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

NOV 27 1996

Ms. Dianne Reed
KPMG Peat Marwick LLP
1600 Market Street
Philadelphia, Pennsylvania 19103

Dear Ms. Reed:

Thank you for forwarding to me your letter to the editor of the Philadelphia Inquirer. I am afraid that I must disagree with your assertions in several respects.

A historic city is a unique collection of buildings, neighborhoods, pathways, sights, and dozens of other attributes that give it a distinctive character. We travel to special cities to experience these attributes for ourselves - if this were not the driving force behind leisure travel, people could simply stay home with a CD-ROM. Similarly, we travel to historic sites to gain direct experience - to walk where both great and common people of the past have walked, and to try to put ourselves in their places. Communities preserve themselves, and the National Park Service preserves and interprets historic sites so that we and our children can continue to experience the real thing.

This philosophy, our experience with what motivates and inspires visitors, and our faith in the intelligence of the public are the driving forces behind the National Park Service's concept for redevelopment of Independence Mall. We believe that neither cities nor historic sites lend themselves to "sequenced" visiting such as one finds in a theme park or within a museum. Given excellent orientations, visitors can and certainly will choose routes and destinations for themselves. Our hope is that they do indeed go off on tangents to see as much of the park and the city as they can.

We believe that encouraging visitors to broadly experience the area's resources is in the best interest of the community's cultural institutions and economy, rather than "ensuring" that one single proposed institution, the National Constitution Center (NCC), achieve unprecedented entrance receipts. The NCC can best ensure its financial viability by determining and adhering to feasible construction and operational projections.

COMMENTS

To the Editor of the Commentary Page:

I have recently had an opportunity to review the competing plans for Independence Mall. The one that makes the most sense to me is that proposed by the National Convention Center. The concept in the Center's study is strong for a number of reasons. First, at the ground level, the Center's design allows for a thorough exploration of liberty and independence without detracting from the prominence of the Liberty Bell or Independence Hall as icons for these values. The Center makes our nation's founding principles tangible and exciting, and prepares the visitor to encounter the artifacts that put us directly in touch with our heritage. And it does so in one integrated, harmonious continuum.

Indeed, after experiencing the full magnification of America's founding values that the Center provides, the visitor will be struck by the juxtaposition of great ideas with the domestic scale of the real buildings where the drama of their creation took place. Independence Hall was built at the same time as Versailles, but built to colonial not imperial scale—no patriot among us would dispute which structure has the more profound resonance for mankind. The Center's plan, with its sequencing of the interpretive Center, the bell, and the Hall will really inspire a leap of cognition in the visitor, who is going to say, perhaps for the first time, "I get it!"

And how lovely the design of the Center is, as a series of luminous glass domes. Since medieval times, the radiant glass wall has been associated with transcendence and inspiration. The interpretive work of the Center is mantled in this rich ambience. This is a strength building on strengths.

The Liberty Bell and Independence Hall are Philadelphia's greatest tourist attractions, which has presented the occasion for an institution that pays homage to the significance of our treasures in the story of liberty. Indeed, Philadelphia's claim to be the preeminent location for an interpretation of our founding principles was validated by the act of Congress establishing the Center as the national Constitution heritage site. It is an opportunity whose promise should not be wasted.

A spirited dialogue regarding the best design approach is healthy, but it is important to remember that finances are at the core of achieving our dream of this unique celebration of liberty. Center funding is based on retail and gate sales projections that are dependent on one of the verities of real estate: location, location, location.

The demand generated by a premier national cultural attraction like the Center would nearly double current traffic (currently 1.5 million visitors), with a peak capacity of the facility of 3,300 visits per hour. These numbers are actually conservative, estimating about the same market share of Mid-Atlantic states' tourism for Philadelphia that the city now experiences for the nation as a whole (3

Dianne E. Reed, Commentary on Independence Mall

RESPONSES

2

The NCC will be a wonderful addition to the resources of the park and the city, but it will not supplant them.

Sincerely,

Martha B. Atkins
Martha B. Atkins
Superintendent

RESPONSES

COMMENTS

percent). A significant investment is involved in a first rate design (\$200 million), and the Center's entrance simply must attract projected income of \$20 million per year, if the operating costs are to be met. It's in our best interest to make sure that the Center's financial plan, which enables a self-supported institution requiring no financial assistance from local government, is achieved. Therefore it is prudent that there not be competing focuses for the visitor's attention, when he/she is looking for the most important thing to see first upon arrival at the Mall.

The first question in the mind of the visitor to the Independence Mall is going to be, where do I start? Our goal should be to get the visitor to the National Constitution Center entrance as soon as possible. When our best shot is to communicate the magic and the majesty of liberty, we don't want to start our visitors off confused--would Alice have found Wonderland if there was more than one rabbit hole? We can be in control of this story, if we can just avoid going off on tangents, literally, all over the place. The time has come to prioritize our options, not dilute and trivialize our message with a multiplicity of contenders. The best course is to stay with the simplest and most significant strength: the original National Constitution Center plan. Let's just have one front door to the liberty shrine, the National Constitution Center's door.

Dianne E. Reed, Ph.D.
September 13, 1996

Dianne Reed is a Senior manager at KPMG Peat Marwick LLP.

Dianne E. Reed, Commentary on Independence Mall

COMMENTS

Received DSC-PM

OCT 25 1996

ALVIN HOLM A.I.A.

ARCHITECTS

Comments on the National Park Service
Preferred Scheme for Independence Mall
Presented at the Public Hearing
on September 25, 1996

by Alvin Holm, a Philadelphia architect

I want to talk about the smallness of the scheme before us, the proposed asymmetries, the casual downsizing, the lack of grandeur. Last month in response to a series of inquirer articles we all debated the question - "Who Stole the American Dream?" There were many accurate answers. The darn Democrats, the stupid Republicans. "A pox on both your houses," said some. Line up the usual suspects. I have some additional candidates. It is also the planners and the architects who are recomposing history and revising the words and the rhetoric of architectural symbol and meaning. We are witnessing the dismantling of that American Dream as we are de-constructing the Mall.

This plan, in diagram and words, is not a scheme to dream on. It is a fall-back position, a painfully modest confession that we do not measure up.

Humankind has always magnified its dreams, sought to express heroism and ideals in exalted terms. Greatness has always been expressed in an enlarged scale of buildings, monuments, and landscape. Why now are we minimizing?

There has been much talk of reducing the scale of the mall to express the egalitarian ideals of the nation. But what of the traditional architectural symbols of democracy? Are 200 years of architectural expression in America wrong? Do the malls and boulevards and vistas of our Nation's Capital no longer symbolize a magnificent Republic?

If the National Park Service and others speak of Penn's grid plan as uniquely democratic and therefore to be emphasized at the expense of the grand Mall, what are we to say of the radial plan of Washington, D.C. that our founding fathers chose to express the ideals of Democracy?

Does the fact that almost every state capitol in the country is symmetrical and grand, set in some sort of larger than life formal

2014 SANSOM STREET, PHILADELPHIA, PENNSYLVANIA 19103 (215) 963-0747

RESPONSES



IN MANY WAYS TO

United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

NOV 07 1996

D18 (INDE)

Mr. Alvin Holm
2014 Sansom Street
Philadelphia, Pennsylvania 19103

Dear Mr. Holm:

Thank you for attending the public meeting on the General Management Plan for Independence National Historical Park, and for providing a copy of your remarks.

We have greatly appreciated your contributions to the planning process because you have provided such a full consideration of a particular school of thought. Now that we are near the end of the process, however, we must agree to disagree on the concept for Independence Mall.

The park and the mall celebrate the greatness of ideas and the intellect and bravery of the citizens who debated and acted on those ideas. Even if we were to agree with your statement that "greatness has always been expressed in an enlarged scale of buildings, monuments, and landscape," and we most assuredly do not agree with the statement, our vision for the park is not about architecture, but rather about people and their individual responses and experiences.

We believe that people make their way here because they want to learn and understand something about the basic agreements that gave birth to our nation. They want to see and walk within the buildings where the seminal events took place. In our interpretive work, we do not tell people what to think. Nor should urban design tell people what to think. We trust each individual to come to his or her own conclusions, and we believe that each person's conclusion is equally valid. If you truly understand the origins and the meaning of the Declaration of Independence and the Constitution, and the emphasis on the individual rather than the state, you'll understand the proposed concept for the mall.

While I am sorry that we haven't agreed, I do not "apologize" for the concept, and I reject your use of terms such as casual downsizing, lack of respect for institutions, and minimizing.

COMMENTS

context mean nothing today? Why is symmetry shunned? Symmetry is built into every state house in America. What does "Balance of Power" mean if not symmetry — the House and the Senate of equal value? What about the Capitol in Washington? The Dome of Government and the symmetrical chambers of Congress?

Now it seems all these symbols are in question. Now it is "downsizing," "break the axis," "asymmetry," etc. We have knocked our national heroes off their pedestals, and now we don't have any at all. Columbus was dumped. We mutter about the morals of George Washington and Thomas Jefferson (slave-holders, you know, and those mistresses!). We no longer respect our institutions and we do everything to minimize them. We don't even respect the office of President, let alone any Senator. But we once did and we can begin again.

For the planning of the Mall for the next century of our nation — let our souls magnify, not diminish. Instead of shuffling into the Millennium apologetically, our tails between our legs, we could be striding into the next century trailing clouds of glory.

Let's get the Dream back in the Scheme.

RESPONSES

2

They apply neither to the park, nor to the mutual efforts of the community and the National Park Service to understand and act on the meaning of this place.

Sincerely,

Martha B. Atkins
Martha B. Atkins
Superintendent

COMMENTS

Received DSC-PM
OCT 23 1996

JOHN LAWSON ARCHITECTS
812 Chestnut Street, 2nd Floor
Philadelphia, Pennsylvania 19107
215 351-0560 Fax 215 351-0565

15 October 1996

Mrs. Martha B. Aikens, Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

Re: Revised Preferred Alternative
Supplemental draft GMP/EIS

Dear Martha:

Since I have also written to you as part of the *Ad Hoc Architectural Joint Committee* whose comments were given at the public meetings by Frank Weise and Walt Moleski, I do not want to repeat those here; rather, the purpose of this letter is to summarize my comments made at the public meeting on September 24th.

According to recent newspaper articles, many parks here in the state of Pennsylvania may have to be developed, at least partially, in order to survive, and it appears INHP may fall into the same condition. Ironically, many of the open spaces we enjoy in Philadelphia, such as Independence Mall, were created by demolition of built structures. Now new buildings are being proposed to be built there, such as the Gateway Visitors Center and the National Constitution Center. These are heady days of public-private deal making as urban centers struggle for their lives. We must stay alert and consider carefully the various possibilities that present themselves.

I applaud the Park Service's bold move to reconfigure the Mall. However I believe that the bubble diagrams locating the two major new buildings (the GVC and NCC on the second block) should be rotated 90 degrees so that they would flank 5th and 6th Streets between Market and Arch Streets. This would leave the central space open so that it could be developed in a three-dimensional, meaningful way.

The third block can be developed in a similar way with hotel buildings, and possibly other commercial/institutional uses, flanking 5th and 6th Streets to populate this area. I hope that the planning for this block can occur simultaneously with the second block rather than postponing it for some future date. The northern Gateway Element described in your report would be even more effective if it truly introduced visitors to the park at this point, and were an integral part of an entrance sequence to the park.

John Q. Lawson PALA
Lorne Eder AIA
Rollin R. La France AIA

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
313-315 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

NOV 27 1996

Mr. John Q. Lawson
John Lawson Architects
812 Chestnut Street
Philadelphia, Pennsylvania 19107

Dear John:

Thank you for participating in the public meeting for the General Management Plan for Independence National Historical Park, and for your thoughtfulness throughout the public planning process.

Unlike the regrettable situation of Pennsylvania state parks, there is no danger that Independence National Historical Park will not survive, and indeed thrive on its own. We do believe that carefully crafted limited partnerships with the private sector will enable the park to provide an enhanced level of services to visitors. Partnerships with state and local government also will enhance services, and will aid those jurisdictions in realizing economic development goals through cultural tourism.

As you can imagine, many possibilities for organizing new structures on Independence Mall have been studied in the past three years. The second block of the mall is more than twice as long as it is wide, and aligning new uses along the 5th and 6th Street edges would leave a central space even more narrow than what exists now. We believe that the current proposal, Alternative E-1, would provide a central space that could be developed in a three-dimensional, meaningful way, as you suggest.

It certainly was our desire that all three blocks of the mall would be planned simultaneously. Three years of public discussions produced no compelling alternative future for the third block of Independence Mall, however. In addition, no reason presents itself to abrogate National Park Service policy regarding commercial uses on park lands. However, as the second block of the mall is redeveloped, and if other conditions change to the west and east of the mall, new and better programmatic and physical solutions may become apparent.

I appreciate your concern regarding the closure of the 500 block of Chestnut Street. Under separate cover, you will have received by now copies of the traffic reports prepared by Orth Rodgers & Associates, Inc. that studied the impacts of closure, and suggested possible mitigating measures.

COMMENTS

JOHN LAWSON ARCHITECTS

M. Aikens, INHP letter 10.15.96
page 2

Chestnut Street might be narrowed but should not be closed off to traffic entirely. If it is I'm afraid that the effect on the surrounding historic neighborhood and business establishments will be disastrous and that the goals of the city and tourist industry will be stifled rather than enhanced by INHP development.

The physical planning for this area should occur as soon as possible and a Master Plan prepared now to study and organize the various pieces and parcels of the puzzle. Otherwise, how will property lines, or limits of site area, be determined for each of the various parcels if they are developed one at a time? How can common utility lines to serve current and future needs be planned for if there is no real plan yet? Is there enough time for this planning to be completed before the pressures of the tourist industry demand that the Visitors Center be built immediately?

This next planning phase will be most important. I hope that the National Park Service will proceed with the same care expended thus far in this updating of the management plan for Independence National Historical Park.

Sincerely,

John Q. Lawson
John Q. Lawson FAIA
JQL/lj

RESPONSES

2

We certainly agree that the next phase of planning is important. No one piece of the "puzzle" of the mall will proceed until there is a detailed physical understanding of the entirety. I know that you have understood that a CMP is not a master plan, and I trust you know that we do too!

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

COMMENTS

Received DSC-PM
OCT 25 1995

Martha Atkins
Superintendent
Independence National Park
313 Walnut Street
Philadelphia, Pa. 19106

Dear Superintendent Atkins:

I recently had the opportunity to read the "Revised Preferred Alternative" proposal for Independence National Historical Park, and was shocked to say the least. Shocked that after all the news reports I read that stated how the park service was "against" any change in the layout of area in front of Independence Hall, I now find that you are now in favor of a change.

Superintendent, I am the owner of a card, gift and souvenir store located in the Bourse Building. I have put my entire life savings into building my business into one that provides me with a decent living. There are thousands of tourists and school groups that (as part of their day) visit the Bourse daily to use the restrooms, eat at our food court and shop at the retail stores. Without these people and the money they spend while at the Bourse, I will be forced to put my staff and face the real possibility of losing my business. I must tell you, I am 100% against

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
313-315 Walnut Street
Philadelphia, PA 19106

IN REPLY REFER TO:

NOV 3 7 1995

D18 (INDE)

Ms. Barbara Kutz
For Every Occasion

Dear Ms. Kutz:

Thank you for your letter regarding the general management plan for Independence National Historical Park. I am sympathetic to your concern, and hope that I may be able to allay it.

Currently, book and gift stores are located at our present visitor center at Third and Chestnut Streets, and at the Pemberton House, on Chestnut between Third and Fourth Streets, replacing one which was formerly located in the West Wing of Independence Hall. I imagine that you have visited these stores and noted that the selection of items is limited to those that have a direct interpretive connection to the park. Profits from sales at these stores support interpretive programs at Independence and other national parks.

During the last two years, the National Park Service has offered a series of proposals for the park, most of which included a new visitor center on Independence Mall. Any new visitor center would replace the one at Third and Chestnut and would include a gift shop selling books and souvenirs.

The redevelopment of the mall, the addition of new facilities that will have a strong attraction particularly for families and school children, and the promotional efforts of the new Greater Philadelphia Tourism Marketing Corporation are expected to greatly increase tourism to Philadelphia's historic area, both in absolute numbers and in length of stay. This increase should benefit all entrepreneurs by providing a larger pool of customers. Facilities in the Bourse enjoy an excellent location and should continue to be an important draw for visitors.

Sincerely,

Martha B. Atkins
Superintendent

RESPONSES

COMMENTS

The National Park Service proposal, and are very upset that they would even think of opening a concession area which would house a gift and souvenir store that would absolutely have a devastating impact on my business. Please reconsider your position on this issue..

Sincerely,

Barbara Hatz
For Every Occasion,

COMMENTS

RESPONSES

2-84

October 18, 1996

Martha B. Aikens, Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, Pennsylvania 19106

Dear Ms. Aikens:

The following issues are listed as per the October 18th deadline for public input to the General Management Plan process for Independence Mall. Please forgive my typewriter's small letters (like the "c" and "n", O & N) show the year and year of service.

* The Liberty Bell should be sited north of Market Street, not on the first block of the Mall;

* One of the Mall's most outstanding assets is the one and two-thirds blocks long space, looking north from Independence Hall to the arches of the Judge Lewis Quadrangle. This space has, repeatedly, failed to co-exist with densely-packed citizens. The biggest, most, failed to fill this public space, and at these times the displacement of the Bell Pavilion is even more evident.

* Once again, it would "archive" and "address" a suburb of octonials if the Liberty Bell were sited, on the Mall's centerline, just north of the Quadrangle's arches.

* The Great Flag is the most stunning concept for an American Monument to the American Spirit that I've ever seen. It could serve to provide the sense of activity and energy on behalf of the southern reaches of the Mall. The issues of scale were laid down decades ago when the Penn Mutual Tower was built a block south of Independence Hall.

Last year, I wrote more extensively on the thoughts I have, for the Mall, that would lead to a UNITED, NOT DIVIDED MALL.

Thank you for your response to these thoughts.

Sincerely,

R. Mitchell Deighan

R. Mitchell Deighan



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

NOV 3 1996

D18 (INDE)

Mr. R. Mitchell Deighan

Dear Mr. Deighan:

Thank you for your comments on current plans for Independence Mall. We hope and believe that the mall will continue to be understood as one united space, just as the blocks of the park between 6th and 3rd Streets are one place with many spaces to be discovered and experienced by residents and visitors.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

COMMENTS

The National Park Service
Independence National Historical Park
213 Walnut Street
Philadelphia, PA 19106

October 15, 1996

Dear Sir or Madame,

I strongly agree with those who have urged that the President's House be reconstructed on Independence Mall in letters in *The Philadelphia Inquirer* and at the September 25 public meeting at the Visitor Center. *The Inquirer* published my letter (see enclosed) proposing that the Independence Park Institute be housed in a reconstructed President's House.

I think enough documentation of the mansion exists to make a reconstruction practical. There are at least two original drawings of the President's House (see enclosed) -- the early 19th-century watercolor by W. L. Breton (from the Atwater-Kent Museum) which shows the whole streetscape, and a front elevation by "Mason" drawn in 1837 (shown on page 178 of *The American Philosophical Society's 1953 Historic Philadelphia*) just before the (by then altered) mansion was demolished.

Washington added a large 2-story bow window to the south side of the house, creating the semicircular ends of the State Dining-Room (on the first floor) and the State Drawing-Room (on the second). He enlarged the servants' quarters in the kitchen ell, and converted the second floor "bathing room" into his private study and dressing-room. Washington provided much of the furniture for the President's House, some of which was sold at auction, some of which returned with him to Mount Vernon, and some of which remained in the mansion. The dimensions of the rooms are recorded in the insurance surveys of the Mutual Assurance Company (the "Green Tree"), and their decoration in contemporary descriptions. The furnishings are documented in the household accounts, in the auction records, and in inventories by both Washington and Adams.

The rethinking of Independence Mall offers the opportunity to reconstruct the President's House on its original site, and to combine it with the proposed Independence Park Institute:

1. The President's House/Independence Park Institute would be on the south block of Independence Mall, across Market Street from the proposed Gateway Visitor Center, about 50 feet west of the Liberty Bell Pavilion, where public restrooms now stand.
2. The President's House/Independence Park Institute would have seminar rooms in the four recreated public rooms of the mansion -- the State Dining-Room and Washington's family dining-room on the first floor, and the State Drawing-Room and the "small" drawing-room on the second floor. The staircase in the entrance hall would be recreated. The Steward's Room at the southeast corner of the first floor would have an elevator to all floors, and a stairway to the cellar for restrooms, coats and utilities.
3. The Steward's Room and the room above it would offer access to the kitchen ell.
4. The first floor of the kitchen ell would have a large restaurant-sized kitchen capable of catering large events in the mansion, in the garden, or both.
5. The second floor of the ell would have offices, and could have a recreation of Washington's study at the south end overlooking Independence Hall.
6. The third and fourth floors of the mansion would have housing for VIPs and their staff, including a Presidential Suite which could be used when the President of the United States or any other world leader visits Philadelphia.



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

NOV 07 1996

D18 (INDE)

Mr. Ed Lavlar

Dear Mr. Lavlar:

Thank you for your participation in the public meeting for the General Management Plan for Independence National Historical Park and for your letter.

The notion of reconstructing the house in which George Washington and John Adams lived during parts of their presidencies raises many intriguing issues, but also poses many problems. We have declined to consider reconstruction for a number of reasons. Reconstruction of vanished structures is strongly discouraged by the Secretary of Interior's Standards for Historic Preservation. Nationwide experience with past reconstructions has been the basis for this policy, which has to do with intellectual honesty and also practicality. The National Park Service's resources are extremely limited and we are obligated to concentrate them on the preservation of original structures. A collection of reconstructed buildings would be a drain on these small resources.

Additionally, the Deahler-Morris house, in which President Washington resided during 1791, is part of the park. We know that Washington held cabinet meetings in the house and reached a decision on the Neutrality Treaty there. This house is the most historically intact building in Independence National Historical Park, and may be the only extant "white house" dating from Washington's presidency. We have chosen to allow that historic house, which is original and which has an important 240 year history, to represent our first president.

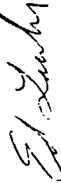
While I regret that you disapprove of the way in which the park interprets the Federal Period of American History, we believe that

COMMENTS

6. A walled garden extending from the mansion to 6th Street would provide a secure outdoor area for special events and receptions.

Independence National Historical Park does an excellent job of teaching the Declaration of Independence, a good job teaching the Constitution, but not a good job teaching the Federalist period. The President's House/Independence House Institute would become an additional visitor attraction within the Park - one focusing on Washington and his presidency, the Federalist period, and the struggle between Jefferson and Hamilton to define the powers of the Federal Government.

Sincerely yours,



Ed Lawler

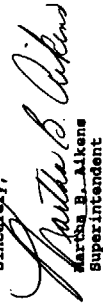


RESPONSES

2

Old City Hall and Congress Hall are excellent sites in which to tell the stories of the new government.

Sincerely,



Martha B. Atkins
Superintendent

RESPONSES

COMMENTS



TRANSFER TO PHILADELPHIA

To the dismay of New Yorkers who had counted on retaining the Capital, the government moved in 1790 to Philadelphia, long the richest and largest city in America. The popular belief was that the move had been instigated by Robert Morris, the financier, who appears at left in a 1790 cartoon dragging a small minority of Congressmen on his "buckle of money and refinement," while the majority follows tamely in his wake. Above, a pencil and watercolor sketch shows Morris' elegant town house, which was put at Washington's disposal, and at right a page from Stephens' *Dictionary of the City* includes an entry for the President of the United States. In 1793 Washington, who had seen the beginning of Auburn's steamboat, witnessed the beginning of Auburn transportation in America when he went to Germantown to see France's



COMMENTS

RESPONSES

178

HAROLD DONALD

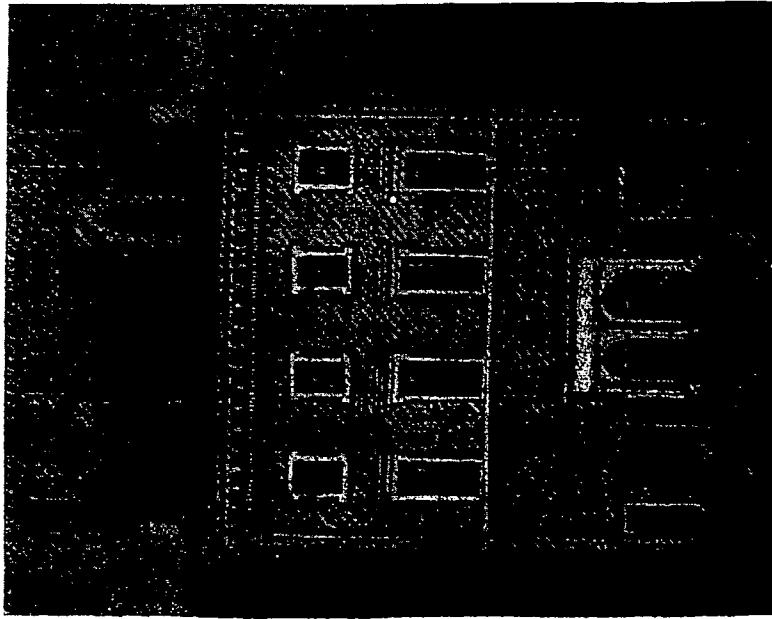


FIG. 4. From water-colour sketch now in possession of Richard Norris Williams II. Made by Mason in 1832 just before the building was demolished. The marks of the original window and door pediments were still visible on the wall after the house was converted to commercial use.

We had more company to-day than ever upon any occasion.

Washington slept here, and that house ought to be rebuilt

I agree with James J. Cunningham's call to reconstruct the President's House on Independence Mall (Letters, Oct. 2). According to John F. Wrenn's *Annals of Philadelphia*, the President's House was a 45-foot-wide, four-story Georgian mansion of South Street at High Street (now Market Street), 60 feet from Vieux Carre. The house was built in 1792 by Mary Lawrence Morris, who gave it to her daughter in 1773 when the daughter married Richard Penn, a grandson of William Penn and the colonial governor of Pennsylvania. The Penns moved to England in 1773, and the house was sold to the British. At different times during the war, the house was occupied by British Gen. William Howe and Gen. Benedict Arnold (when he was on our side).

Financier Robert Morris bought the mansion from the Penns in 1783 and lived there until 1790, when he moved to Philadelphia. George Washington, a guest of Morris, lived in the new capital of the United States. Washington lived in the President's House until he was succeeded by John Adams in 1797. Adams lived in the mansion until 1800 when the capital was moved to the District of Columbia. The President's House was demolished in the mid-19th century.

There have been proposals to reconstruct the President's House before. Most recently, speakers urged the National Park Service to do so at the Sept. 25 public meeting at the Visitors Center. Unfortunately, the answer was that they didn't want to confuse the public by mixing the President's House with the White House. The National Park Service has been asked to accept the plan to reconstruct the President's House as part of the Independence Mall project. The plan is to reconstruct the President's House on the same site as the original house, but with a new design. The plan is to reconstruct the President's House as part of the Independence Mall project. The plan is to reconstruct the President's House on the same site as the original house, but with a new design.



The President's House was a Georgian mansion located on what is now Market Street.

In the many plans for Independence Mall, one building has been moved around more than any other and appeared in a variety of different locations. The President's House, one of the three blocks, this Independence Park Institute is to have office space, seminar space, and a museum. The reconstructed President's House would be placed on the site of the original. It would be just off of the central lawn of the first block. If the mansion were reconstructed, visiting U.S. presidents or other heads of state could have the option of staying in the President's House — on the same ground where Washington lived. The plan is to reconstruct the President's House on the same site as the original house, but with a new design.

Ed Landry
Plymouth Meeting

COMMENTS

ALISON B. GRAHAM • [REDACTED]

September 25, 1996

TO: Independence National Historical Park
RE: Redesign of Independence Mall

From the elegantly simple cedar pavilion at the Cape Cod National Seashore to the reflective glass wall of the underground Valley Forge Visitors Center, architects for the National Park Service have produced a number of evocative and highly appropriate public buildings.

Why, then, has it been so difficult to remake Independence Mall into a coherent and compelling center for understanding and interpreting the most important history of our country? The Park Service's latest proposal for developing the mall, as shown in Sunday's Inquirer, is a disaster. It places disparate buildings at random, off-center and crosswise, breaking up the long vista which was the reason for clearing the mall in the first place, and sticking a parking area for endless yellow school buses in the middle -- hardly an inspiring sight.

In redeveloping Independence Mall, function is as important as beauty, and function requires that visitors be given a logical progression through the site, from arrival to interpretive visitors center, then exhibits, the Liberty Bell and Independence Hall. In particular, since the city wants the visitor center to cover a number of other city attractions, it belongs at the northern edge of the mall, not in the middle. And for both safety and aesthetic reasons, vehicles should be kept away from pedestrian areas.

As the AIA committee that studied the problem noted, "Independence Mall is a space, but it is not yet a place." The new plan must achieve a successful balance between the dual roles of providing new structures for interpretation of our history, and preserving the open gathering space which serves as America's ceremonial front yard. The problem with the present mall is that it has no sense of enclosure to define its space and make it a desirable destination. For this reason, the new buildings should be ranged around the edges, like the Washington Mall, with a grassy open lawn in the middle, and the view open from Independence Hall on the south to the Gateway Center on the north.

We must never forget that here we are memorializing the processes and the documents which created our great country. Without being imitative, the new buildings should be graceful and formal counterparts to Independence Hall; this is not Disneyland. And nothing should be done to Independence Mall until we are sure that it makes sense, improves our understanding of the important events which have taken place here, and is inspiring and beautiful.

Attach: Site plan with descriptions

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
3115 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

NOV 07 1996

Ms. Allison B. Graham

19096

Dear Ms. Graham:

Thank you for attending the September 25 public meeting on a revised Preferred Alternative for Independence National Historical Park and for providing testimony and a drawn plan. I regret that you disapprove of what was represented as the National Park Service plan in the newspaper. I hope our actual presentation clarified some of the points of the proposal.

We don't feel that planning for the park has been difficult. The park is a place about which many people feel strongly, and it was important to spend the time that is necessary to allow everyone to think about, discuss, and understand the many proposals that have been offered. Sometimes, the process becomes contentious, but we have now reached a point where there is consensus on the basics, as we noted in the newsletter and in our presentation.

Let me respond to some specific points that you raise:

• The vista on Independence Mall was not the reason for clearing the mall, but rather was a response to the need to organize 15 acres of cleared land that had no purpose.

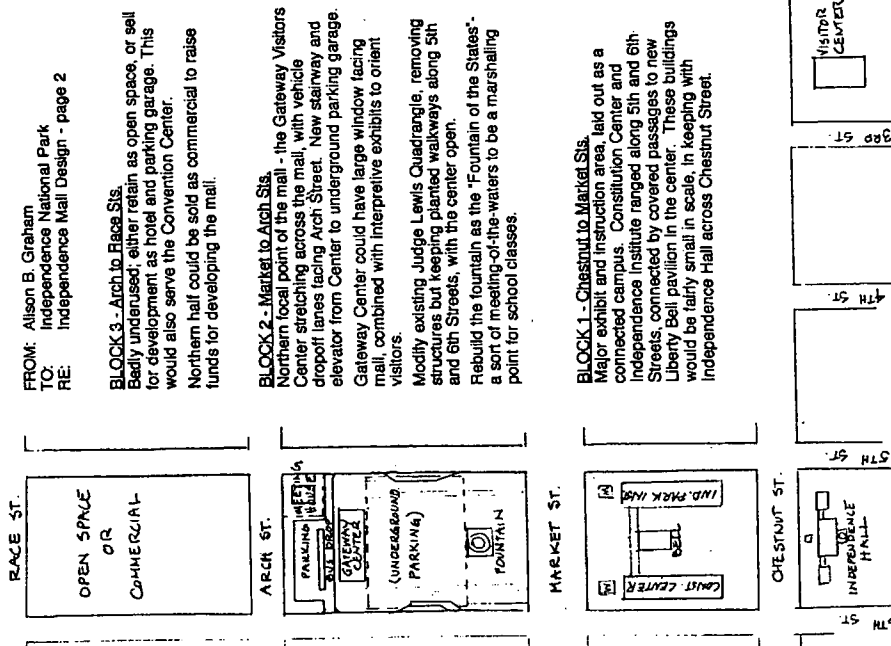
• A drop off lane, and not a parking lot, is proposed to handle buses on the mall. Buses will park beyond the historic district.

• Independence Mall often is contrasted to the mall in Washington, D.C., but the two spaces have little in common. Independence Mall is only 350' wide, many times smaller than Washington's mall.

• I believe that you have identified the core issue for the mall with your statement that a plan for it must balance development for interpretation with the preservation of open space. I hope that on

RESPONSES

COMMENTS



FROM: Alison B. Graham
TO: Independence National Park
RE: Independence Mall Design - page 2

BLOCK 3 - Arch to Race Sts.
Badly underused; either retain as open space, or sell for development as hotel and parking garage. This would also serve the Convention Center.
Northern half could be sold as commercial to raise funds for developing the mall.

BLOCK 2 - Market to Arch Sts.
Northern focal point of the mall - the Gateway Visitors Center stretching across the mall, with vehicle dropoff lanes facing Arch Street. New stairway and elevator from Center to underground parking garage. Gateway Center could have large window facing mall, combined with interpretive exhibits to orient visitors.
Modify existing Judge Lewis Quadrangle, removing structures but keeping planted walkways along 5th and 6th Streets, with the center open.
Rebuild the fountain as the "Fountain of the States" - a sort of meeting-of-the-waters to be a marshaling point for school classes.

BLOCK 1 - Chestnut to Market Sts.
Major exhibit and instruction area, laid out as a connected campus. Constitution Center and Independence Institute ranged along 5th and 6th Streets, connected by covered passages to new Liberty Bell pavilion in the center. These buildings would be fairly small in scale, in keeping with Independence Hall across Chestnut Street.

2
review of the material you received at the public meeting, you will agree that we have developed a plan that does just that.

Sincerely,
Martha B. Atkins
Martha B. Atkins
Superintendent

COMMENTS

Received DSC-PM

OCT 23 1996

October 14, 1996

Superintendent Independence Hall Historical Park
313 Walnut Street
Philadelphia, PA 19106

Re: INDEPENDENCE MALL DESIGN

A number of suggestions for improving the Independence Hall Mall have been published in the Philadelphia Inquirer. Not the least of which began its heading with the appeal "Think Big - Why not? - Think BIG!"

Very properly a mall is an axis between two focal points. Obviously the old state house is the southern focal point. The northern one should be an architectural expression of the rise of a national union in quest for and support of personal liberty. With the Mall dedicated to the Constitution, the area lays out a kind of grand dialectic of approach from Independence through the Constitution to its antithesis, interdependence and unity. In this Hall Americans declared the divine right of individual liberty and sent forth a Constitution yielding limited powers for the sake of security in exercising the retained individual rights. Then, through the Constitution they built a powerful union. Their perception of their motives and destiny are expressed architecturally in the unity structure at the north end.

For the unity structure consider thirteen columns founded in a wide ring constructed as curves toward an ever rising central goal, the concept of personal liberty. These raise up a fifty sided polygon ring uniting and strengthening them. The union supports the curves to rise higher asymptotically toward the common goal and a white terminus which is a blazing white light at night. This signifies that although the ideal is not perfectly realized, the brilliance of its pursuit has raised up a beacon of political morality for the modern world.

The polygon ring provides an enclosed corridor along which the States display the mind and might they have contributed to the ideal and strength of the union. In the center of the ring the Liberty Bell calls forth the first movements of the thirteen columns. It looks to the surrounding exhibits of the fifty states that respond to its call, and through transparent walls the exhibits of the States keep in sight the icon of liberty from origin of the union.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

IN REPLY REFER TO

D18 (INDE)

NOV 07 1996

Mr. Joseph J. Benischek

Dear Mr. Benischek:

Thank you for your letter offering a new concept for Independence Mall. Both the concept and the structure you propose are strikingly different from the National Park Service proposal. Let me very briefly comment on the key difference.

In our view, it is the ideas of the founders that are and will remain "big." We find that the intellectual and emotional responses of each visitor, whether citizen or international, also tend to be "big." We disagree with the idea that a big and static architectural expression is necessary to honor or convey the significance of the nation's founding ideals.

The NPS proposal is founded on allowing each person to understand and come to his own personal conclusions regarding that significance. In our interpretive programs and services, we do not tell people what they ought to think. Similarly, we believe that it is not the role of architecture to dictate thought in a free society.

Sincerely,

Martha S. Kirens
Martha S. Kirens
Superintendent

COMMENTS

RESPONSES

The Liberty Bell should be positioned above eye level of viewers standing on the ground. The podium should be provided with inclines to allow viewers to pass the bell in procession as well as to view the bell from assembly below.

The possibility of repairing the crack using modern technology should be evaluated. It is said that a bell cast to proclaim liberty throughout the land has become, however revered, broken and silent. Even if with the crack repaired the bell not be strong enough to withstand the impact of a full swing into its strike, the bell might be tough enough to endure repeated striking with a light mallet. On special occasions the sound of a metallic strike could be amplified electronically to simulate a full swing of the bell into its own strike. A scar that would likely remain on the bell would still serve to recall the Liberty Bell's history as well as to suggest that there are prudent limitations even to the exercise of liberty.

This unity structure comprising thirteen curves of pursuit in revolutionary red raising up a fifty sided polygon ring in union blue and continuing through them toward a brilliant white goal framing the Liberty Bell at its heart abstracts a summation of history and a continuing goal for the future as we Americans would like to perceive them.

The Mall to reverence the Constitution should be swept clear of all obstructing and cluttering structures not specifically relevant to the Constitution. The need for a museum to show Americans how the Constitution affects their life appears as another indictment of American education and a rejection of the economy and efficacy of modern media for delivering the message. In any case any museum should likewise be underground as is the one before the Arch at St. Louis. Parking and service structures such as bus drop off and reception center should be out of sight - off the mall or underground. Even the Quaker Meeting House should be more appropriately located as it is incongruous and disruptive to the celebration of the Constitution. The mall should allow a clear line of sight between the Liberty Bell and Independence Hall. The mall should be left as green as possible to suggest that the Constitution is a living instrument.

Along a promenade on the west side of the clear vista the preamble of the Constitution and the Bill of Rights should be written out. Paralleling this to the east there could be an 'Avenue of Heroes'. In number the modest monuments and statues would rival the Gettysburg battle line - a kind of American forum memorializing those who distinguished themselves in the formation, defense or protection of the Constitution. These would look over the Constitution - west to its realm across the continent to the ocean and beyond.

This design integrates all features of the park north of Independence Hall into a coherent celebration.

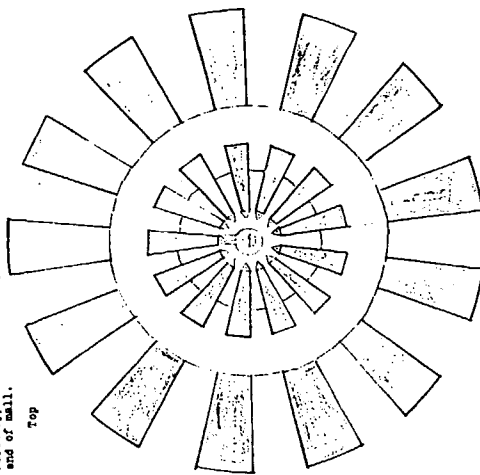
Joseph J. Benischek

Joseph J. Benischek

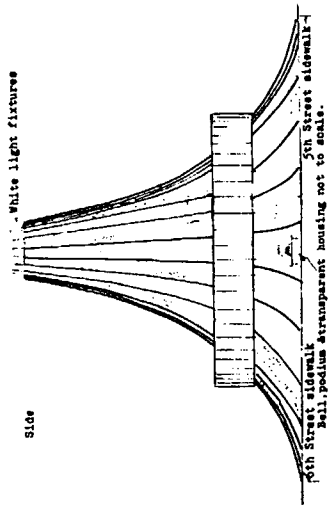
RESPONSES

COMMENTS

First approximation of Unity Structure for location at Race Street
end of mall.
Top



Side
White light fixtures



COMMENTS

EDMUND N. BACON

October 15, 1996

Martha B. Aikens, Superintendent
Independence National Historical Park
National Park Service
313 Walnut Street
Philadelphia, PA 19106

Dear Superintendent Aikens:

I did not attend the public hearings in September, 1996 on your Alternative E-1. Preferred Alternative plan for Independence Mall because I was in agreement with your recommendation as to which functions would occur within which blocks. I commend you on the great improvement this represents over the material you presented in September 1995.

When I expressed concern to you about the vagueness of your 1995 plan, which consisted of three rectangles on which various circled numbers were scattered about, you informed me that this was not intended to be a physical plan, that the National Park Service would start work on such a plan in the spring of 1996. Now, one year later, we are presented with exactly the same kind of document, three rectangles with circled numbers scattered about. While there is great progress on the decision as to which buildings are in which block, there is no progress at all on any system to determine where these buildings are to be located within the blocks, how they relate to one another and to their services, what form the overall development would take. In fact we actually have gone backwards because the location of several basic functions are presented to us as still being undecided. Among these is the location of the bus dropoff, a decision which must be made before anything sensible can be done about anything else. There is no good reason for deferring this decision any longer.

It is unfair to the various institutions interested in improving and enlivening the Mall to leave them hanging, after two years, with no clear picture as to how they fit into a definite overall scheme. Until such an overall scheme is made they are in a stranglehold, effectively prevented from doing anything. Already we are one year behind the schedule the National Park Service presented to us in September 1995. We still have no clear picture as to when such a definite scheme ever will be forthcoming.

This situation has caused me such concern that I have developed on my own, working with George Schaefer, architect, a complete architectural plan and model which incorporates all of the institutions and functions contained in the National Park Service Preferred plan E-1, arranged in accordance with their internal needs, their relation to one another and to a coherent,

Received DSC-PM
OCT 23 1996

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

NOV 07 1996

Mr. Edmund N. Bacon

Dear Mr. Bacon:

Thank you for your letter and for your continuing interest in and efforts on behalf of the redevelopment of Independence Mall.

It was your concerns and those of many other people that led us to reconsider the plan for the mall and propose a revised preferred alternative. While we had hoped to reach a greater level of detail in 1996, it was more important to concentrate on reaching a basic level of agreement about the mall, which is now reflected in the current plan. And, as you know better than most, reaching the same level of agreement took almost half a century under the city and commonwealth's jurisdiction, and actual construction took another two decades. So I hope that we may be forgiven an extra year to gain public agreement, clear up numerous questions of infrastructure, including the underground parking garage, and get it right.

As the detailed plan has not been initiated, your work continues to anticipate ours. As you point out in your final paragraph, your plan does meet many of the criteria expressed for a successful mall, and with other proposals, it certainly will continue to be considered when we reach the design phase.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

RESPONSES

COMMENTS

²
functional, overall architectural design. This is presented in a model now on display at the Philadelphia Free Public Library, so carefully detailed that it could be translated into construction drawings immediately. This frees up possibilities for action.

Every aspect of this plan is based, not on a capricious scattering of individual elements as though they had no effect on one another, rather on a careful analysis of the functional interrelation of each part with each other part, both within the Mall itself and with the city around it. All of the elements function together in a synergy which can be achieved in no other way.

This plan, because it is definite and detailed, lifts the public dialogue up out of the vagueness which now surrounds it onto an entirely new plane of clarity long overdue. This must be done before anything sensible can be done about anything.

1. Location of Bus Dropoff

Your preferred plan shows the bus dropoff parallel with Market Street extending across the Mall from Sixth to Fifth Street.

There are three possible places for this crossing.

The northern one, between the electric substation and the Free Quaker Meetinghouse and the parking garage is too far north to be effective

The next one to the south would be to cross over above the underground parking garage. Since the structure of the garage would have to be reinforced to carry the load of the buses, this would raise so many procedural complications, questions of interagency coordination and extra expenses as to be impractical.

The remaining possibility would be on the bed of former Commerce Street south of the parking garage. This would leave a strip of land so narrow between itself and Market Street as to be unsatisfactory for any major structure. Also it would effectively cut off access from Market Street to the public gathering space in the center of the block.

In all cases the exiting traffic proceeding north on Fifth Street would have to take the narrow, one lane underpass at the approaches to the Benjamin Franklin Bridge.

The alternative bus dropoff parallels Sixth Street between the existing ramps to the underground parking garage and the existing arcade along the west side of the underground parking garage. This plan provides an efficient dropoff for five buses in a location which could be covered, with a fine view through the arcades into the central plaza of the Mall. Since the block from Market to Arch Streets is about twice the length of the normal

RESPONSES

COMMENTS

blocks between the north-south streets, a traffic light could be put in the center of the block to facilitate the buses crossing lanes to make a right turn onto Market Street. Market Street here has adequate traffic capacity for the buses. These may proceed north on Seventh Street, which has been widened up to Vine Street, to remote parking areas or to the trip home. This provides an efficient bus loop with assured traffic capacity. It entails no left turns and at no point interferes with the view from Independence Mall to Race Street.

It is impossible for the Pew Charitable Trusts to give any intelligent consideration to the location and design of the Visitor Center until the matter of the location of the bus dropoff is settled. If the decision is made to put it parallel with Sixth Street detailed plans can be started immediately and construction carried on independently of any program the Parking Authority may have for repair or reconstruction.

At the north end of the bus dropoff I propose the Independence Park Institute. This is conveniently located in relation to the dropoff for the school buses and looks out upon a potentially fine garden to the north in which the school children may eat their lunches.

My plan shows the bus dropoff parallel with Sixth Street in a beautiful, glass roofed Entrance Hall.

2. Location of the National Constitution Center.

The placing of the three elements, the Independence Park Institute, the Gateway Visitor Center and the bus dropoff all in the strip of land along Sixth Street adjacent to but not interfering with the parking garage, leaves unencumbered the entire comparable strip of land between the parking garage and Fifth Street, stretching from Market Street to the Free Quaker Meeting. This is the only site large enough for the requirements of the Constitution Center, assuming that nothing new is built in the public open space over the parking garage nor obstructing the existing access to it from Market Street. This site has the enormous advantage of giving the Constitution Center a presence and an entrance on Market Street in a building which matches the Visitor Center, just a few steps away from it. Since the Constitution Center will be a major draw on the block, this location will be beneficial to the whole Mall development.

The space between these matching buildings provides a handsome plaza leading from Market Street into the central gathering place on top of the parking garage. Beneath this plaza may be developed a covered connection between the Visitors Center and the Constitution Center, embellished with a beautiful open atrium. The parking garage may be connected with this place as well by a handsome, well-lit vestibule, making the experience of arriving underground much more inviting than it now is.

COMMENTS

RESPONSES

Some people may be concerned whether the National Constitution Center will be able to raise the amount of money required for its ambitious plans. Since the Center will be one of the principal draws of the entire Mall development we should give it every encouragement we can and remove any impediment to its moving forward.

My model shows the Constitution Center in a new above ground building extending from Market Street to the southern wall of the garden of the Free Quaker Meetinghouse.

1. Repair or reconstruction of the Parking Garage

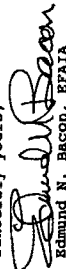
Since there is no overlapping of functions in the plan proposed above, the timing of the construction or reconstruction of the Visitor Center, the Independence Park Institute and the National Constitution Center may each proceed on a timetable independent of the other projects. This has enormous advantage for the practical needs of each of these three institutions. This would mean that the size and scale of the plaza now atop the parking garage would be retained, perhaps with grass replacing the pebble concrete paving of the central section. It may be hoped that the brick and marble arches of the present arcade can be retained whatever repairs may be necessary for the garage, if that is not possible, and their demolition is required, it is vitally important that these arcades be rebuilt in their present form. They are extremely handsome. Their usefulness and appropriateness will become evident as new uses are developed around them which will bring people into the area.

My plan calls for building six arches, three on each side, along the northern edge of the plaza to give a sense of containment and definition to the plaza at its north end, with the central section left open to provide a view into whatever is developed for the northern block.

I respectfully submit this plan and model to the National Park Service for consideration as the basis for the development of Independence Mall.

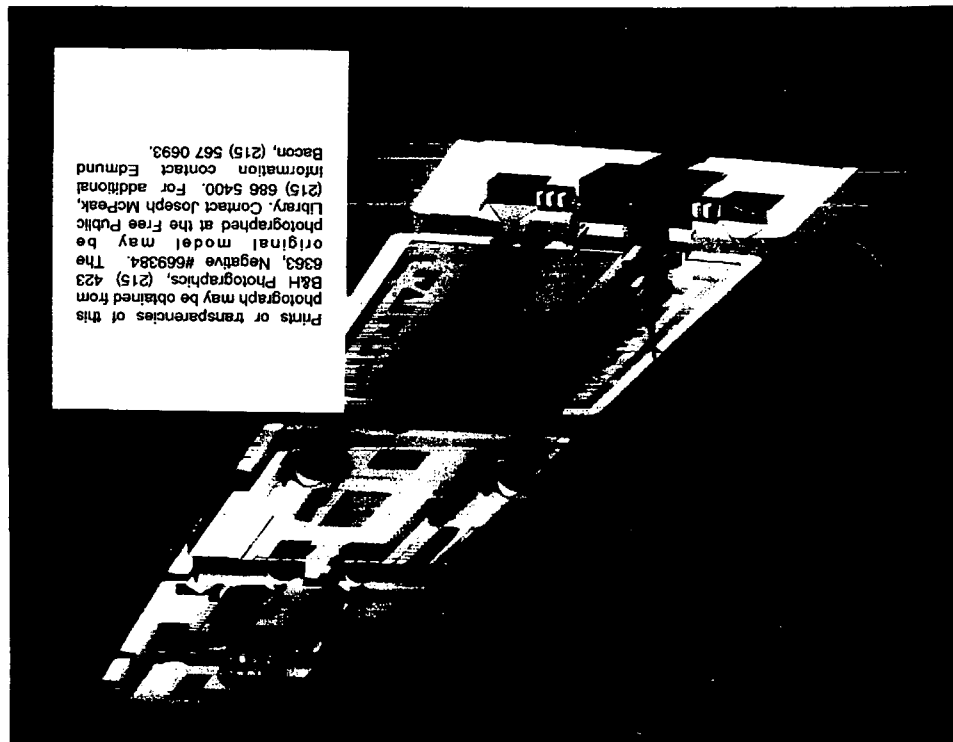
I stress that this plan precisely accords with your preferred plan 8-1 except for a slight shifting of a few of its elements as dictated by practical considerations and logic.

Sincerely yours,


Edmund N. Bacon, EPAIA

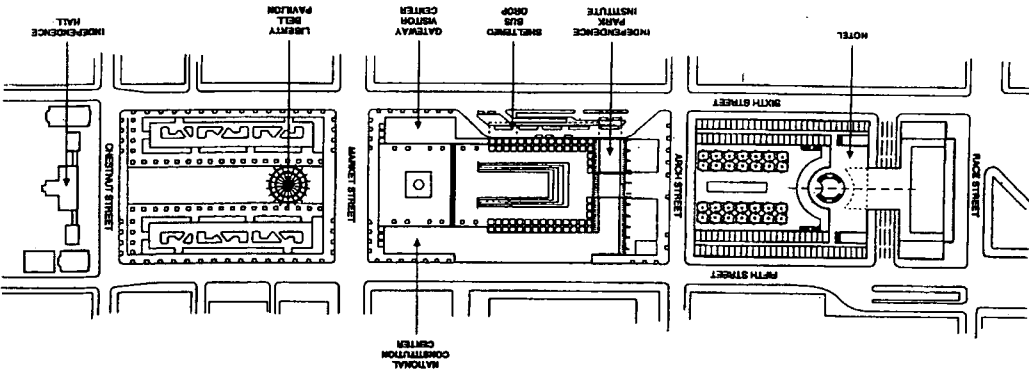
RESPONSES

COMMENTS



RESPONSES

COMMENTS



COMMENTS

SEP 12 1996

To whom it may concern,
I've been sitting back and reading articles about ideas for Independence Mall & think a lot of the ideas are great. I enclosed is a copy of a letter and a plan of how I believe they should build on the mall. Please do think about my ideas of the plans. Thank you for your help and taking the time to read my letter.

Sincerely,
Michael D. Malley

Michael D. Malley
[Redacted]

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY, PLEASE TO:

D18 (INDE)

NOV 07 1996

Mr. Michael D. Malley

[Redacted]

Dear Mr. Malley:

Thank you for sending me a copy of your letter to the editor of the Philadelphia Inquirer and of your plan for the mall. I am enclosing a copy of the National Park Service's current proposed plan for Independence National Historical Park, of which the mall is a part. I will add your name to our mailing list, so that you can receive information directly.

Sincerely,

Martha B. Aikens

Martha B. Aikens
Superintendent

Enclosure

COMMENTS

RESPONSES

SEP 12 1993

Dear Editor, (Commentary)
I leave for Independence Mall

I think that we should seriously look at building a replica of George Washington's home on its original site, because he was the first President of the United States and Philadelphia is where it all started. (George Washington's home at 432 and 434)

The National Constitution Center should be built on the other side of the block at 5th and Market, the is Block #1, at the site of the house where James Madison stayed during the time of the Constitution and should have a plaque in the lobby stating this.

The Liberty Bell Pavilion can be moved to the center of the block, and slightly enlarged with its original footprint that was used when it was housed inside of Independence Hall.

The proposed site of the Independence Park Institute on Block #2 on the corner of Market & 5th. It is a good idea.

(NEXT PAGE)

COMMENTS

RESPONSES

SEP 12 1988

The Gateway Visitor Center, I think, should be located at the 4th St. end of Block #2 at 4th and 6th Streets.

The Shattered Bus Shop should be located on Block #3 at the corner of 4th and 6th Sts (across the street from the Gateway Visitor Center.)

It also being we should plant more trees and shrubbery to beautify the mall.

If and when the buildings are constructed the style should be of colonial style only and that the buildings are spread out properly so it doesn't look congested.

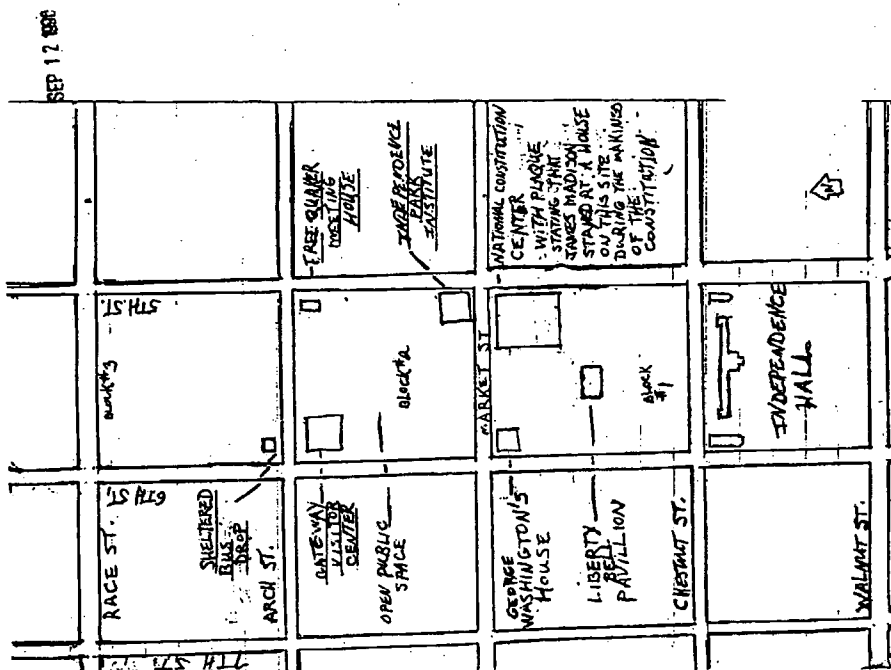
More or less we need a mall that goes in the Philadelphia vicinity and the rest of America will be proud of for years to come.

Michael D. Malley
MICHAEL D. MALLEY
MICHAEL D. MALLEY

2:00 pm - 10:00 pm /
A. Enclosed is a copy of (2 days later).

RESPONSES

COMMENTS



COMMENTS

Statement on the Proposed Plan for Independence National Historical Park

The vision and contributions of Judge Edwin O. Lewis in opening up the three blocks in front of Independence Mall seem to be increasingly lost in the various plans that have surfaced for the Mall. Most of the plans as stated in a Philadelphia Inquirer article dated September 7, 1996 are directed to "changing" the Mall from open space "that is supposed to provide a view of Independence Hall" to a space filled with buildings.

Judge Lewis, who first worked as a reporter in the old Philadelphia Ledger Building, was concerned about the fire hazard to Independence Hall from the many warehouses that then occupied the area now known as the Mall. As a Virginian, he was also concerned with heritage. He saw the need for a vista for America's most important historic site as well as a place where large crowds could assemble when world leaders came to the City. The only other place with adequate space to accommodate such crowds is in front of the Art Museum, and that is not suitable for historic occasions.

The best compromise between Judge Lewis' design and needs that have arisen since he died would be to move the Visitors' Center up to the third block and share it with the picnic area outlined in the National Park Service Plan. The Constitutional Center has no place on the Mall whatsoever. The federal legislation authorizing a Constitution Center (Act 100, U.S. Congress 1988) specifically states that the Secretary of the Interior "shall establish" a National Constitutional Center "within or in close proximity to the Independence National Historical Park." An appropriate place for this Center would be the Present Visitors' Center once it is vacated.

If the second block were left open for overflow crowds for great gatherings and the Liberty Bell Pavilion minimized, the vista of Independence Hall that Judge Lewis recognized as being so important could be preserved. Market Street should be closed to vehicular traffic as well as Chestnut.

The beautiful fountain created to memorialize the contributions made by Judge Lewis has fallen into disrepair and, as recently as several years ago, there was an attempt to replace it. Judge Lewis had always hoped to have a great fountain at the end of the third block, linking the Mall and Pennsylvania with New Jersey across the river, but he was not successful in this endeavor. Perhaps, as the plans for the Hall fall into place, this could still be considered and a fountain erected in this spot and named for Judge Lewis. This fountain could provide the anchor or balance that most agree is needed for Independence Hall at the other end of the Mall.

In closing, may I say that I hope that the decision makers will take into account what Judge Lewis did for Philadelphia and what his purposes were in so doing.

Eleanor M. Morris
Eleanor M. Morris, Step Daughter-in-law of Judge Lewis and
Member, Mid Atlantic Council of the National Park Service
October 17, 1996

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

INDEPENDENCE TV

DLS (INDE)

NOV 07 1996

Mrs. Eleanor M. Morris
President, French and Pickering
Creeks Conservation Trust, Inc.
Coventry House

Dear Mrs. Morris:

I want to assure you that the contributions of Judge Edwin O. Lewis in the establishment and planning of both Independence National Historical Park and the former Independence Mall State Park have not and will not be forgotten. The entire second block of Independence Mall, designated the Judge Edwin O. Lewis Quadrangle by the Commonwealth of Pennsylvania, will continue to bear this name. An additional commemoration of his contributions will be established within the new visitor center on the mall.

We understand the Judge and the many citizens who worked with him in his efforts to establish the parks desired the long mall to spark redevelopment of the neighborhood, to provide a grand entrance to the city from the Ben Franklin Bridge, and to provide a fitting setting for Independence Hall. Redevelopment did occur. The grand entrance was established, but was obliterated when the bridge plaza was merged with Interstate 676. A majority of observers have come to the conclusion that the great length of the mall detracts from Independence Hall, and that the mall's long narrow space is not well suited for the use of the people who visit daily, as opposed to for immense events that happen seldom.

The Judge Edwin O. Lewis Fountain is, in fact, beyond repair. Rather than being filled with buildings, the Judge Lewis Quadrangle will retain almost as much open space as currently exists, yet in a more useable configuration.

RESPONSES

COMMENTS

2

Thank you for being one of the people who remembers history as it was made. I hope that you will continue to keep abreast of plans for the mall as they develop and to comment on them.

Sincerely,

Martha B. Atkins
Martha B. Atkins
Superintendent

Section 3



**Corrections to the August 1995
Draft General Management Plan
Environmental Impact Statement**



PURPOSE OF AND NEED FOR THE PLAN

DESCRIPTION OF THE PARK

Location and Access

Page 4, paragraph 1, correct text to read:

As defined by the establishing legislation, eleven parcels of land, mostly contiguous, are within the authorized park boundary:

Change (3) to read:

the irregularly shaped tract bordering both sides of Locust Street between Fourth and Fifth Streets and running from Locust to Walnut Street in midblock, containing park residences in restored 18th century townhouses and landscaped open space; and a roughly rectangular plot at Fifth and Manning Streets (the maintenance facility location)

Page 5: Change (6) to read:

the L-shaped tract in the center of the block bounded by Front and Second, Walnut, and Chestnut Streets that contains Welcome Park, the parking garage, and the Bond House (the area bounded by Chestnut, Walnut, Front, and Second Streets, referred to as area F).

Delete:

~~(12) the area bounded by Chestnut, Walnut, Front, and Second Streets, referred to as area F.~~

Page 6, top of page, rewrite section to read:

Properties with Memoranda of Agreement

The Deshler-Morris House is owned by the National Park Service and is a part of Independence National Historical Park; a memorandum of agreement provides for others to operate and manage the property. There is a similar agreement with the managers of the Free Quaker Meeting House. The privately owned Carpenters' Hall and American Philosophical Hall and Library have signed separate memoranda of agreement of indefinite term with the Department of Interior for access. There are also agreements with the city of Philadelphia regarding Independence Square buildings and agreements with Christ Church, St. George's Church, St. Joseph's Church, and Gloria Dei (Old Swede's) Church. While the specific terms of the individual agreements vary in detail, all of the private groups have agreed to permit access to buildings and maintain and preserve the structures and grounds. The National Park Service agrees to include each site in the interpretive program of the park and, within limits of available funding, provide technical assistance in planning, preservation, protection, and restoration. The memorandum of agreement with the city of Philadelphia and Independence National Historical Park allows for the city to retain ownership of the properties on Independence Square while the National Park Service preserves and manages them.

Page 6, second paragraph, second sentence, change to read:

The National Park Service also has memorandums of agreement with the institutions that govern Christ Church, St. George Methodist Church, Mikveh Israel Cemetery, and St. Joseph's Church.

Page 6, last paragraph, first sentence, change to read:

In 1824, when preparations were underway for the return of Lafayette, an effort was made to restore Independence Hall to its original appearance. Preservation efforts have been continuous in the years since. Preservationists have continued to actively explore ways to best preserve Independence Hall and develop the surrounding area into a more appropriate commemorative and historic setting. In 1946 Congress authorized the Philadelphia National Shrines Park Commission, chaired by Judge Edwin O. Lewis, to plan for the area around Independence Hall. The commission recommended the establishment of a national historical park in Philadelphia. In May 1949 the commonwealth of Pennsylvania and city of Philadelphia signed a legal agreement to develop a state park on the three blocks north of Independence Hall.

INTERPRETATION

Page 16, change first sentence to read:

Interpretation is information communicated to park visitors . . .

Primary Interpretive Themes. Change paragraph 3 to read:

The themes represent the concepts that all visitors to the park should have the opportunity to learn:

Independence Mall

Page 29, last paragraph, second sentence, change text to read:

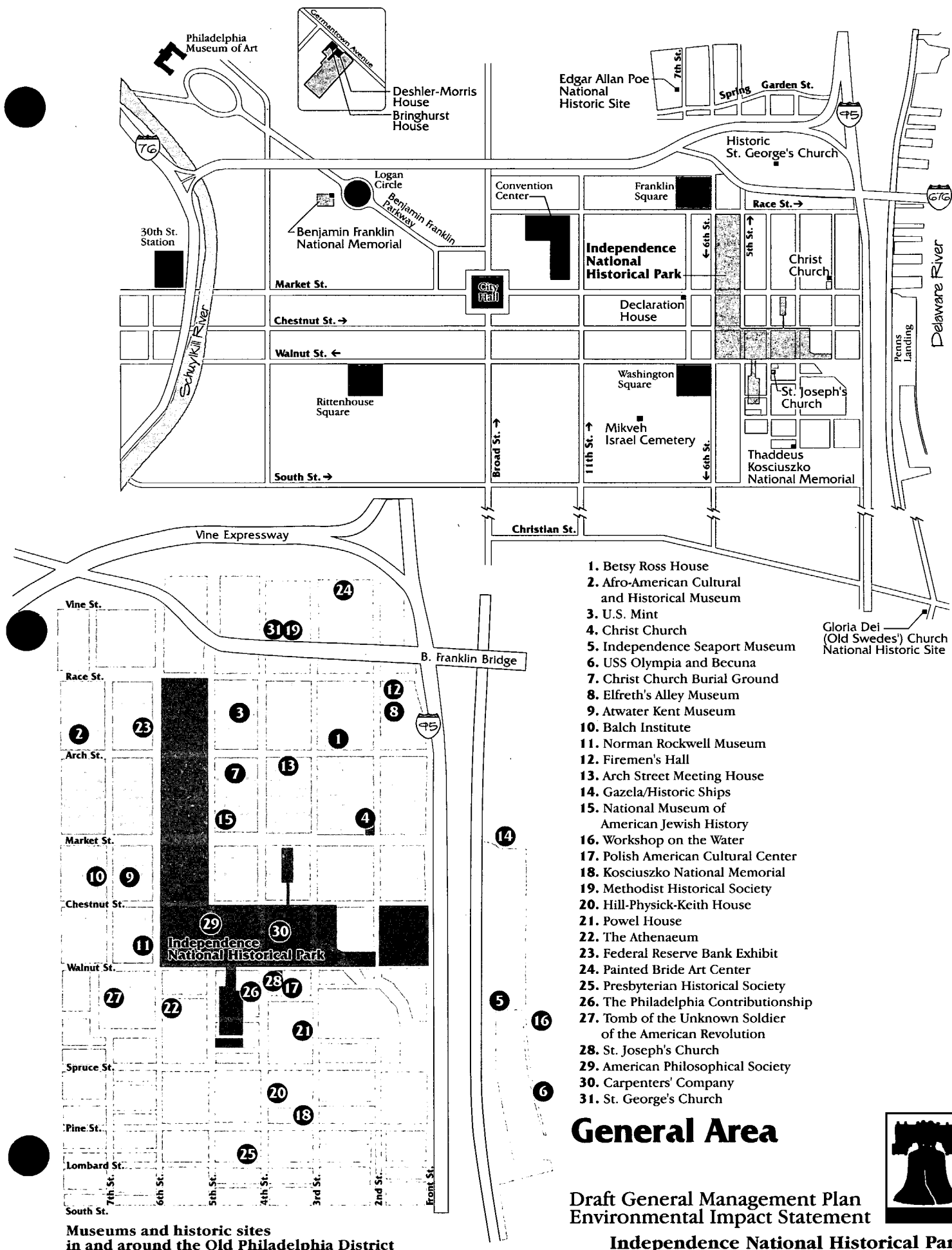
In 1994 the National Park Service completed a *Cultural Landscape Report on Independence Mall*; the National Park Service found the Mall to be ineligible for listing on the National Register of Historic Places; the Pennsylvania state preservation officer concurred in this finding of ineligibility. ~~The nomination categorized Independence Mall as a noncontributing feature.~~

RELATED PLANNING AND DEVELOPMENT PROJECTS

Relationship to Other NPS Plans

Page 31, paragraph 2, first sentence, change to read: A cultural landscape report was completed by the **National Park Service** for the three blocks of Independence Mall.

Page 32, paragraph 2, eliminate duplication: Based on the analysis of visitation statistics of parks nationwide, visitation is expected to climb throughout the life of this plan. ~~Through the life of this plan, visitation is expected to climb.~~



General Area

Draft General Management Plan
Environmental Impact Statement

Independence National Historical Park

U. S. Department of the Interior/National Park Service
391/20093A/November 96/DSC



DRAFT ALTERNATIVES FOR THE GENERAL MANAGEMENT PLAN

Key Elements of the Alternatives

Page 39, Add (Minimum Requirements) to No Action Alternative Heading. Under Partnerships and Cooperative Agreements, Alternative A, correct spelling of partnerships.

ACTIONS COMMON TO ALL THE ALTERNATIVES

CULTURAL RESOURCE MANAGEMENT

Page 46, paragraphs 7, 8, 9, and 10, change to read:

If archeological resources are found during construction, work will be halted and a professional archeologist will make an evaluation following the consultation between the National Park Service and the state historic preservation officer will take place.

~~Any mitigation measures will be undertaken in consultation with the Pennsylvania State Historic Preservation Office and the Advisory Council on Historic Preservation.~~

~~Excavation work will be monitored by a professional archeologist and if resources are identified, the above procedures will be followed.~~

More than 300 park resource studies have been completed since the 1950s. These studies along with base maps and National Register of Historic Places nomination forms comprise a historic resource study. An updated summary of existing studies and new studies suggested by recent scholarship are needed to guide park management.

Page 47, last paragraph, change to read:

State-of-the-art technological solutions will be sought to ensure that all structures and facilities are accessible to the extent possible. Principles of universal design should be applied consistently to any new construction. The needs of people who are not fluent in English as well as those of visitors with disabilities should be addressed.

NATURAL RESOURCE MANAGEMENT

Page 48, paragraph 1, change to read:

The vegetation in the park is a mixture of species native to Philadelphia and introduced plants. The landscaping does not attempt to recreate the historic scene but rather to create an attractive, pleasant setting for the important historic buildings. To the extent possible, indigenous species or vegetation introduced to the area before the 18th century are used. ~~The selection of plants in the park is approved by the park's historic architect so that impacts on historic preservation can be determined.~~ Following completion of cultural landscape studies that will be undertaken as funding becomes available, the park will develop strategies for plantings that are consistent with both historical and contemporary designed landscapes, as well as suitable for thriving in an urban environment. Presently the park employs a horticulturist who selects plantings for the park. The park consults with a historical landscape architect to determine impacts on historical landscapes. Plants that are resistant to disease are preferred.

Paragraph 2, change to read:

The park gardens are distinctive, and all but one would be retained. Gardens at St. Joseph's Church, Signers' Park, Christ Church (along Market Street), Bishop White House, Franklin Court, City Tavern, Carpenters' Hall, and Todd House, as well as the St. George, Magnolia, Rose, and

18th century gardens would be unchanged. The walled Andrew Hamilton Garden on the Judge Lewis Quadrangle would be removed because the walls preclude safe visitor use of the space. The garden at the Free Quaker Meeting House would be redesigned to better connect the site with the rest of the Judge Lewis Quadrangle. **Its walls would be retained to provide the sense of confined space that comprised the building's original context.** ~~The fountain in the Rose Garden would be removed.~~ Partners would be sought to assist in the management of some of the most important gardens. **The Garden Club of America would continue to assist the National Park Service in the maintenance of the garden.**

SITE-SPECIFIC ACTIONS

Pages 50, 51, 52, 53, 54, change order and add entries to read:

Thomas Bond House

Under all of the alternatives, the current use of the Bond House as a bed and breakfast would continue.

City Tavern

Under all of the alternatives, the current use of City Tavern as a restaurant would continue.

Congress Hall

Under each of the alternatives, the structure would be preserved.

Deshler-Morris House

Daily management of this site by the Deshler-Morris House Committee, Inc., would continue through a cooperative agreement under all alternatives. The second floor of the adjacent Brighthurst House would be used for park housing while the first floor would be used as a staging area for tours of the Deshler-Morris House. Interpretation would connect the historic activities that took place in the main park with those at the Deshler-Morris house, and more information would be made available to visitors about the house and its importance, which might encourage more people to visit the site.

Fifth and Manning Streets Maintenance Facility

This facility would be unchanged. It is too small and is poorly located for current storage needs, and additional space would be provided either on the second or third block (in all but the no-action alternative) in the park.

First Bank

The first floor could continue to be used for an exhibit on banking and for changing exhibits or might be leased for occasional private events. The second floor offices could be occupied by friends of the park organizations.

Franklin Court

Under all alternatives the underground museum would be rehabilitated and would have new uses and programs. Signs on the Chestnut Street and Market Street entrances would be improved to more clearly identify the site. Various activities and uses of this site would be promoted.

Free Quaker Meeting House

The building, its grounds, and its programs would be better integrated into the park through interpretation, signs, and marked pathways. Access and identification from the interior of the block to the building would be improved, and it would be easier for visitors to recognize the building and its association with the park. An effort would be made to keep the building open more often. This would be an appropriate location to develop aspects of the 18th century Philadelphia interpretive theme, particularly the story of religious tolerance and the legacy of the Quakers.

Since the building is no longer in its original location, any development must take into consideration those exterior features that are significant and determine the best protection of those features.

Declaration (Graff) House

Under all of the alternatives, the first floor of the Declaration (Graff) House would become an information and orientation center to serve visitors who approach the park on foot along Market Street. The theater would be converted from its current two story height to one story, and a portion of the second floor would be used for additional exhibits. The present exhibits would be rehabilitated and upgraded. The historically furnished rooms on the second floor would remain.

Independence Hall

The hall and related buildings are currently being rehabilitated as part of the parkwide rehabilitation and improvement of utilities project. The west wing will house an exhibit containing the park's copies of the Declaration of Independence, the Articles of Confederation, and the United States Constitution. The east wing will continue to be used as a staging area for tours of the hall.

Judge Edwin O. Lewis Commemoration

The second block of the Mall was named the Judge Edwin O. Lewis Quadrangle by the commonwealth of Pennsylvania in recognition of the judge's leadership in creating the national and state parks. All alternatives would incorporate a prominent commemorative element honoring Judge Edwin O. Lewis in this block. The type of commemoration would vary by alternative.

Liberty Bell

This artifact would be preserved, protected, and interpreted under all alternatives. The presentation of the bell would vary by alternative, in terms of setting, structure, and location.

Merchants' Exchange

Park headquarters and the maintenance, interpretive, and cultural resource management division main offices will move into this building from their current locations at 313 Walnut Street, 339 Walnut Street, and the First Bank. The park library and archives would also be housed in the Merchants' Exchange if the structure is found to be structurally adequate to support their weight.

New Hall Military Museum

The New Hall Military Museum shows the development of the U.S. Army and Navy from 1775 to 1800, celebrates the founding of the Marine Corps and engagements during the Revolutionary War, and houses the Marine memorial. Exhibits and objects include uniforms, dioramas, flags, and weapons.

Pemberton House

A bookstore is housed here.

Second Bank

As part of the parkwide rehabilitation and improvement of utilities project, this building will be rehabilitated. The first floor would continue to be used for the portrait gallery in every alternative. The second floor, which cannot be made entirely accessible to people with disabilities, will be used for administrative purposes without significant alteration of the historic fabric. The interior of the bank has been modified over the years; the exterior is the significant feature of the structure.

Second Street Parking Garage

The parking garage, owned by the National Park Service and leased to the Philadelphia Parking Authority, will return to the park's jurisdiction in 2009, and its management will be reviewed at that time.

313-319 Walnut Street

This building, the park's current headquarters, would be rehabilitated for administrative uses or historic leasing.

Todd House

Under each of the alternatives, the structure would be preserved.

Washington Square

In 1991 the secretary of the interior and the city of Philadelphia signed a memorandum of understanding to transfer this block to the National Park Service after rehabilitation is completed by the Fairmount Park Commission. The memorial to the Unknown Soldier of the Revolution would remain. Local uses such as strolling, sunbathing, and dogwalking would continue in certain areas of the square.

Welcome Park

Welcome Park would remain the same and signs would mark the path between the parking garage and the visitor center.

Bishop White House

Under each of the alternatives, the structure would be preserved.

Special Use Areas

The park symbolizes American freedom as guaranteed by the Bill of Rights. All alternatives recognize the importance of one of the most cherished rights of the American people — free speech — and provide areas for related special events. Parades, rallies, protests, and other gatherings protected by the First Amendment would take place near the Liberty Bell Pavilion, on the Judge Lewis Quadrangle, and at other designated areas. There are areas that serve as a focal point for ceremonial activities of a patriotic or cultural nature that are appropriate to the park's mission.

Some special events include visiting dignitaries. All the special uses require adequate facilities and space.

None of the proposed alternatives recommend actions that would affect the nonfederal properties in area F.

World Heritage Site Designation

The plaque designating Independence Hall as a world heritage site could be placed on Independence Square. It could not be attached to the hall without damage to historic fabric, so a nonhistoric element would be sought for the installation. An appropriate location might be identified in the cultural landscape report for the square. Interpretation of the world heritage designation also would be provided.

National Constitution Center

Public Law 100-433, the Constitution Heritage Act of 1988, mandates the establishment of a national constitution center in or close to the park to increase awareness and understanding of the United States Constitution. Five alternatives suggest locations in the park and one alternative (no action) would rely on the General Services Administration to find a location outside the park boundary. Funding for construction and operations would be provided by the private nonprofit National Constitution Center. The center would focus on education and activities emphasizing the history of the Constitution, its dynamic nature, and its impact on the lives of everyday people. It would also look at the connections between the Constitution and related documents throughout the world, establishing an international context for understanding its historical development and its influence. The size and scope of the center would be determined upon completion of the general management plan and the NCC's program determined through consultation with the National Park Service.

Constitution Memorial

Public Law 100-433 authorizes the secretary of the interior to establish and maintain an appropriate memorial to the United States Constitution as a key document in the nation's history. In all alternatives, this memorial would be located within the National Constitution Center. The specific type and design would be the subject of a future development concept plan.

Collections Storage

Currently the park's collections not on display are located in various structures around the park. The locations fail to meet the necessary standards for museum storage. Under all alternatives, the quality of park collections storage would be upgraded.

FURTHER RESEARCH NEEDS

Page 55, change paragraphs 4, 5, 6, and 7, to read:

All stone and brick buildings at Independence National Historical Park would be surveyed to assess the condition of the stone and brick. This evaluation could be followed by the development of a conservation program.

The park has over 500,000 archeological objects and cares for many city-owned artifacts as well. ~~In many cases new techniques and research questions have emerged since the original analysis of these artifacts and their sites.~~ A program designed to ensure that the park's archeological collections are accessible to both NPS and outside researchers would increase the potential educational value of the artifacts. ~~The results of studies would contribute to the park's interpretive program and to a better understanding of American culture.~~

A synopsis of archeological projects in the park was produced in 1979 and updated in 1987. This document would be updated and expanded into a comprehensive archeological overview. ~~In order to ensure that the resulting document is useful it should be reviewed and revised periodically. This overview could then aid in cultural resource management and interpretive programs.~~

A current and comprehensive archeological overview ~~would be undertaken~~ **would offer** additional benefits. Placing the full range of previous research in perspective would facilitate the evaluation of the strengths and weaknesses of the accumulated data. ~~In the past, work has focused on the 18th century; the 19th century has received less attention. An overview would help to identify such gaps in the archeological record, highlighting those areas in which data is lacking can serve as a guide to future research. By identifying those areas in which accumulated data is strong, an overview would serve to draw the attention of researchers and stimulate interest in the potential of these materials.~~

Cultural landscape reports will provide guidance for development in the park.

ALTERNATIVE A: NO ACTION (MINIMUM REQUIREMENTS)

PARKWIDE ACTIONS

Partnerships and Cooperative Agreements

Change last sentence to read:

Partners would be sought to improve some of the gardens as is currently the case with the Magnolia Garden cared for by the Garden Club of America.

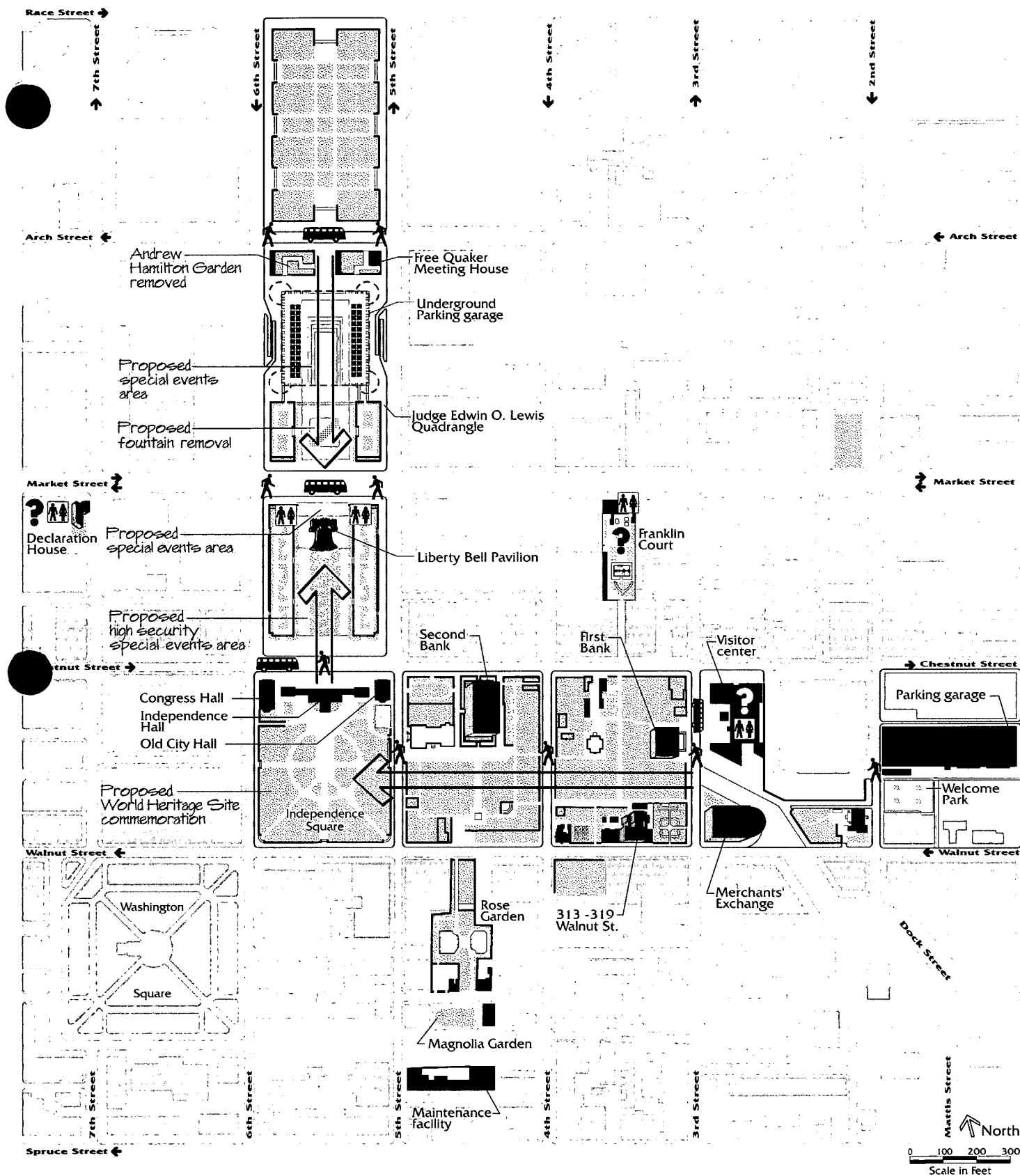
SITE-SPECIFIC ACTIONS

Judge Edwin O. Lewis Commemoration

Change second sentence to read: It would be prohibitively expensive to bring the fountain up to current code standards.

TABLE 2: ALTERNATIVE A — CLASS C COST ESTIMATE

Development Item	Quantity	Gross Construction Costs	Advance and Project Planning Costs	Total Project Costs
Kiosks	4	\$83,800	\$16,000	\$99,800
Signs	20	9,200	1,700	10,900
Redesign midblock crossings (Second, Third, Fourth, Fifth Streets)	4 intersections	136,200	26,000	162,200
Remove/repair Rose Garden fountain	2	6,500	1,200	7,700
Remove/repair Magnolia Garden fountain	1	6,500	1,200	7,700
Graff House remodeling – first floor, theater, second floor	4,800 sf	503,000	96,000	599,000
First Bank — first floor conversion to exhibit space	7,100 sf	930,100	177,500	1,107,600
Pemberton House to interim bookstore – first floor	1,700 sf	178,200	34,000	212,200
313-319 Walnut adaptive reuse	25,845 sf	3,385,700	646,100	4,031,800
Second Block of Independence Mall:				
Remove Hamilton Garden	11,200 sf	\$9,800	\$1,900	\$11,700
Redesign Free Quaker Meeting House garden	6,000 sf	13,100	2,500	15,600
Remove fountain on Judge Lewis Quadrangle/ add brick paving	4,900	137,500	26,200	163,700
TOTAL		\$5,386,600	\$1,027,900	\$6,414,500

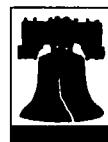


Alternative A No Action

Draft General Management Plan
Environmental Impact Statement

Independence National Historical Park

U. S. Department of the Interior/National Park Service
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ALTERNATIVE B

PARKWIDE ACTIONS

Visitor Experience

Page 62, change to read:

Entertaining and educational activities would be held on the east to west blocks between Sixth and Third Streets. The area would be interpreted as a **historic designed landscape**. The National Constitution Center could be located in the Third Street visitor center.

SITE-SPECIFIC ACTIONS

Page 63, change order of paragraphs to read:

Independence Mall

The Mall would be treated as the primary gateway to the park. The Judge Lewis Quadrangle would be redesigned to include a new park visitor center, and the Liberty Bell would be moved to this block to a new structure associated with the visitor center. A new area for special events, to be called Constitution Plaza, would be located on the block. A driveway allowing dropoff and pickup of visitors to the visitor center would be added. The underground garage would continue to provide automobile parking. A remote location for tour and school bus parking would be designated and dispatch communication for pickup could be instituted. Restrooms accessible to Constitution Plaza would be added. The high brick walls that border the block would be removed. Sitting areas would be added at the edges, and the areas not needed for programmed uses would be landscaped.

Except for the relocation of the Liberty Bell and the removal of its pavilion, the first block would remain as it is. High security special events such as those involving the visit of a head of state would take place on the southern end of the block near Independence Hall. The restrooms would remain.

The third block would remain an open green space and would be redesigned to accommodate an area for picnicking, an area for large-scale special events that could be covered with a tent, and restrooms. Exceptionally large special events — generally associated with holidays — could be accommodated both here and on the Judge Lewis Quadrangle. A multipurpose facility that would include space for curatorial activities, the park's museum storage, archeological, and architectural study collections, visitor protection equipment, and vehicle storage would be added at the north end of the block. A design element would be added to the north end that would indicate the Mall's role as the gateway to the park, as well as act as a terminus to the Mall.

Add to section on costs:

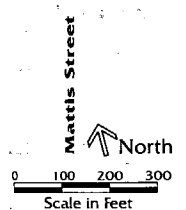
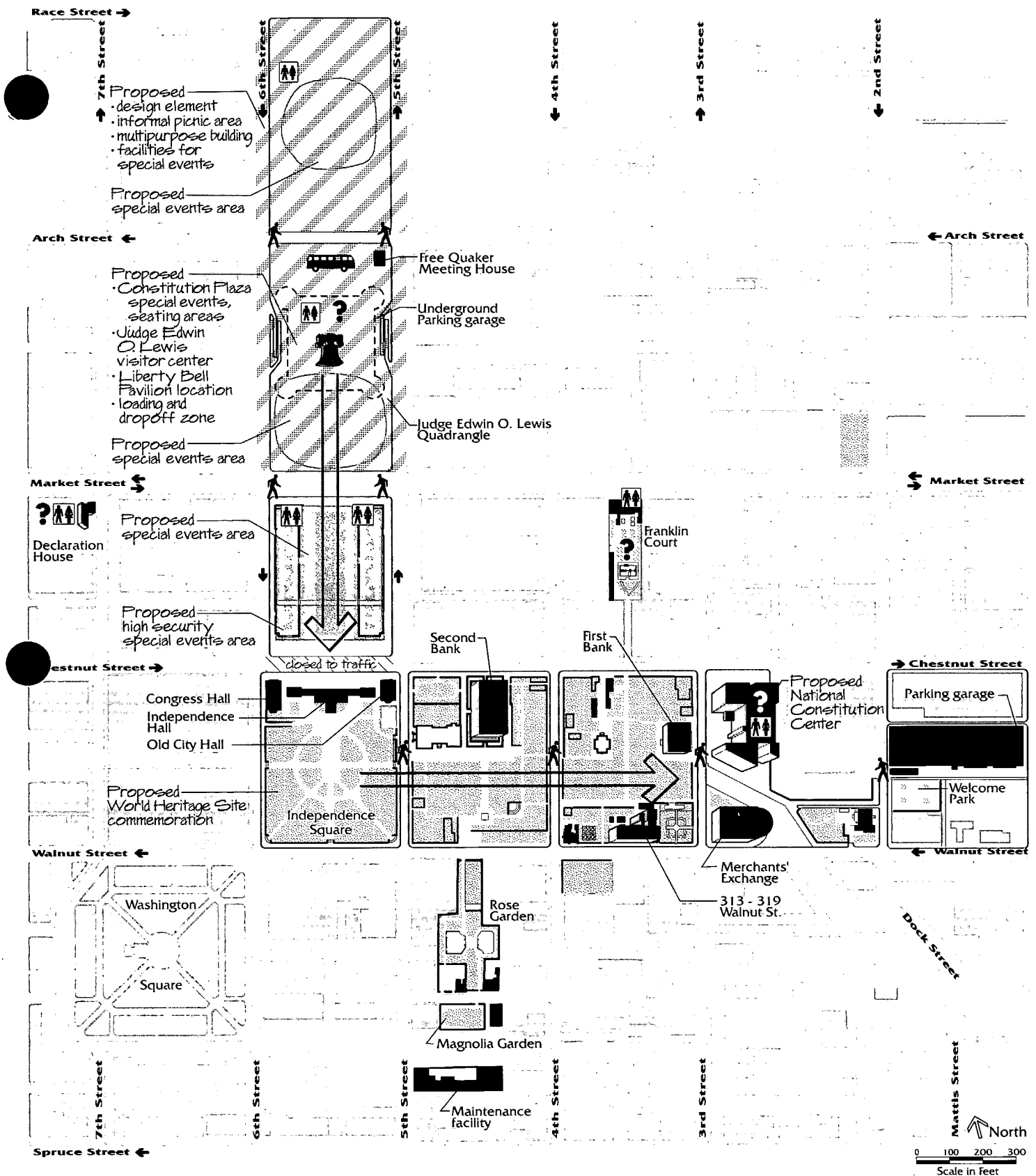
It is anticipated that operational and cyclic maintenance repair costs would for the most part remain unchanged under each of the proposed alternatives. It is projected that any proposed new structures on Independence Mall would be funded by park partners or private donations, rather than through federal appropriations. With the exception of a potential new Liberty Bell Pavilion, any operational or cyclic maintenance costs for any new structures on Independence Mall (e.g., National Constitution Center, Independence Park Institute, and Gateway Visitor Center) would be the responsibility of the park partner. It is assumed that there would be little change in the operational and cyclic maintenance costs for a new Liberty Bell Pavilion over the existing structure.

Detailed design plans would be produced after the *General Management Plan* is finalized. At that time any additional operational costs associated with any redesign of Independence Mall, particularly the second block, would be identified.

TABLE 2: ALTERNATIVE B — CLASS C COST ESTIMATE

Development Item	Quantity	Gross Construction Costs	Advance and Project Planning Costs	Total Project Costs
Kiosks	4	\$83,800	\$16,000	\$99,800
Directional/information signs	20	9,200	1,700	10,900
Redesign midblock crossings (Second, Third, Fourth, Fifth Streets)	4 intersections	136,200	26,000	162,200
Remove/repair Rose Garden fountain	2	6,500	1,200	7,700
Remove/repair Magnolia Garden fountain	1	6,500	1,200	7,700
Graff House remodeling – first floor, theater, second floor	4,800 sf	503,000	96,000	599,000
First Bank — first floor conversion to exhibit space	7,100 sf	930,100	177,500	1,107,600
Rehabilitate visitor center for National Constitution Center ^a	18,647 sf	2,564,900	487,300	3,052,200
Rehabilitate visitor center for orientation and bookstore	1,000 sf	144,100	27,500	171,600
313-319 Walnut adaptive reuse	25,845 sf	3,385,700	646,100	4,031,800
First block of Independence Mall:				
Remove/demolish the Liberty Bell Pavilion	3,576 sf	\$32,700	\$6,200	\$38,900
Rehabilitation and landscaping after pavilion removal	18,000 sf	141,500	27,000	168,500
Second Block of Independence Mall:				
Demolition/clearing of the second block — keep Free Quaker Meeting House	254,000 sf	\$393,000	\$75,000	\$468,000
New park visitor center ^b	15,000 sf	4,716,000	900,000	5,616,000
New Liberty Bell Pavilion	5,000 sf	1,572,000	300,000	1,872,000
Dropoff/pickup area and entrance area to visitor center	40,700 sf	556,700	106,200	662,900
Additional restroom facilities associated with special events plaza	3,000 sf	432,300	82,500	514,800
Structural stabilization and repair of underground garage		2,620,000	500,000	3,120,000
Constitution Plaza (special events) and surrounding seating areas/landscaping	180,000 sf	3,275,000	625,000	3,900,000
Third Block of Independence Mall:				
Demolition/clearing of third block	\$240,500 sf	196,500	37,500	234,000
Design element — end of third block				
Special events plaza/picnic seating area/landscaping	225,000 sf	3,275,000	625,000	3,900,000
Multipurpose building	24,000 sf	4,716,000	900,000	5,616,000
Exterior administrative parking	5 spaces	12,100	2,300	14,400
Restrooms	3,000 sf	432,300	82,500	514,800
TOTAL		\$30,521,100	\$5,822,300	\$36,343,400

^a Costs to be met by the National Constitution Center.^b To be funded by park partners or private donations.



- | | | | |
|--|-----------------------------|--|---------------------------------|
| | Park structure | | Visitor circulation |
| | MOA properties | | Pedestrian crossing |
| | Proposed action sites | | Bus dropoff / pickup |
| | Proposed action area | | Information / orientation sites |
| | Events area | | Restrooms |
| | Open space (lawn or garden) | | |

Alternative B

Draft General Management Plan
Environmental Impact Statement

Independence National Historical Park

U. S. Department of the Interior/National Park Service
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ALTERNATIVE C

Special Use Areas

Page 68, change to read:

Special events would be held on all three blocks of Independence Mall. The ~~lower~~south third of the first block would be adaptable to provide high security to accommodate visits by individuals such as heads of state.

SITE-SPECIFIC ACTIONS

Independence Mall

Pages 69 and 70, reorder paragraphs to read:

A new Liberty Bell Pavilion would be located near the center of the first block. The block would be redesigned to accommodate special events north of the pavilion, high-security special events south of the pavilion, and seating areas. The restrooms would remain.

The Judge Lewis Quadrangle would be redesigned to include a new information and orientation center. A new outdoor public area for special events, to be called Constitution Plaza, would be constructed with a strong visual connection with the new Liberty Bell Pavilion on the first block. A driveway allowing dropoff and pickup of visitors to the information and orientation center would be added. The underground garage would continue to provide parking for automobiles. A remote location for tour and school bus parking would be designated and communications for pickup might be instituted. Restrooms accessible to Constitution Plaza would be added. A multipurpose facility for curatorial activities, collections storage, vehicle storage, bulk storage, and visitor protection equipment would be built. The high brick walls that border the block would be removed. Sitting areas would be added at the edges, and the areas not needed for programmed uses would be landscaped.

The third block would remain as an open green space. Redesign of the block would accommodate an area for picnicking, an area for special events that could be covered with a tent, and restrooms. Exceptionally large special events — generally associated with holidays — could be accommodated both here and on the second block. A design element would be added to the north end of the third block that would mark the Mall as the gateway to the park as well as act as a terminus to the Mall.

Add to section on costs:

It is anticipated that operational and cyclic maintenance repair costs would for the most part remain unchanged under each of the proposed alternatives. It is projected that any proposed new structures on Independence Mall would be funded by park partners or private donations, rather than through federal appropriations. With the exception of a potential new Liberty Bell Pavilion, any operational or cyclic maintenance costs for any new structures on Independence Mall (e.g., National Constitution Center, Independence Park Institute, and Gateway Visitor Center) would be the responsibility of the park partner. It is assumed that there would be little

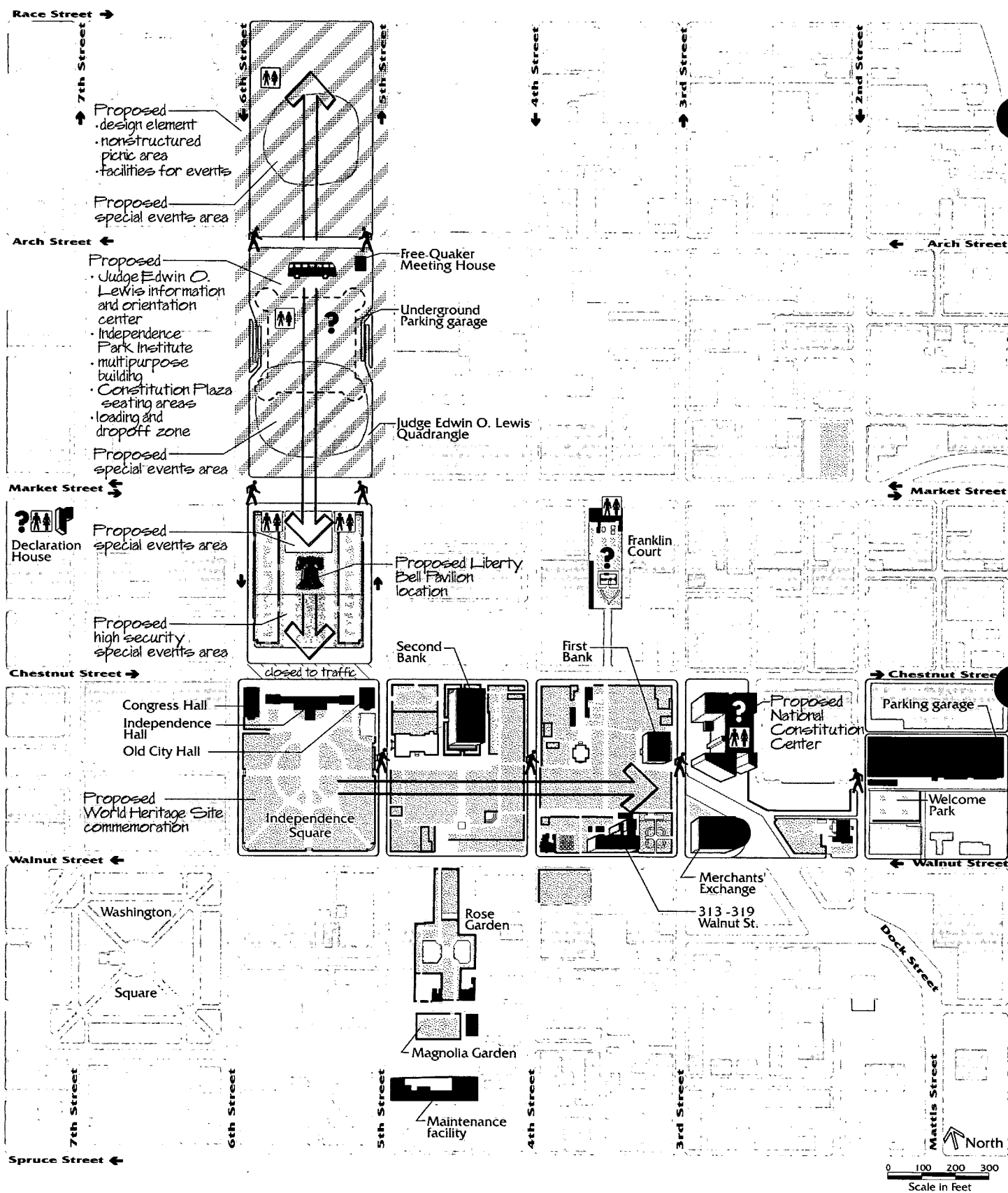
change in the operational and cyclic maintenance costs for a new Liberty Bell Pavilion over the existing structure.

Detailed design plans would be produced after the *General Management Plan* is finalized. At that time any additional operational costs associated with any redesign of Independence Mall, particularly the second block, would be identified.

TABLE 3: ALTERNATIVE C — CLASS C COST ESTIMATE

Development Item	Quantity	Gross Construction Costs	Advance and Project Planning Costs	Total Project Costs
Kiosks	4	\$83,800	\$16,000	\$99,800
Directional/information signs	20	9,200	1,700	10,900
Redesign midblock crossings (Second, Third, Fourth, Fifth Streets)	4 intersections	136,200	26,000	162,200
Remove/repair Rose Garden fountain	2	6,500	1,200	7,700
Remove/repair Magnolia Garden fountain	1	6,500	1,200	7,700
Graff House remodeling – first floor, theater, second floor	4,800 sf	503,000	96,000	599,000
First Bank — first floor conversion to exhibit space	7,100 sf	930,100	177,500	1,107,600
Rehabilitate visitor center for National Constitution Center ^a	18,647 sf	2,564,900	487,300	3,052,200
Rehabilitate visitor center for orientation and bookstore	1,000 sf	144,100	27,500	171,600
313-319 Walnut – rehabilitate for adaptive reuse	25,845 sf	3,385,700	646,100	4,031,800
First block of Independence Mall:				
Remove/demolish Liberty Bell Pavilion	3,576 sf	\$32,700	\$6,200	\$38,900
Demolition/clearing of the first block	185,000 sf	327,500	62,500	390,000
New Liberty Bell Pavilion	5,000 sf	1,572,000	\$300,000	1,872,000
Special events plazas, high security plaza, seating area, landscaping	180,000 sf	3,930,000	750,000	4,680,000
Second Block of Independence Mall:				
Demolition/clearing of the second block — keep Free Quaker Meeting House	254,000 sf	\$393,000	\$75,000	\$468,000
New information/orientation center ^a	20,000 sf	6,288,000	1,500,000	7,788,000
Dropoff/pickup area and entrance area to visitor center	40,700 sf	556,700	106,200	662,900
Independence Park Institute ^a	10,000 sf	3,144,000	600,000	3,744,000
Additional restroom facilities associated with special events plaza	3,000 sf	432,300	82,500	514,800
Structural stabilization and repair of underground parking		2,620,000	500,000	3,120,000
Multipurpose building	24,000 sf	4,716,000	900,000	5,616,000
Exterior administrative parking	5 spaces	12,100	2,300	14,400
Constitution Plaza (special events) and surrounding seating areas and landscaping	180,000 sf	3,275,000	625,000	3,900,000
Third Block of Independence Mall:				
Demolition/clearing of third block	\$240,500 sf	\$393,000	\$75,000	\$468,000
Design element — end of third block		196,500	37,500	234,000
Special events plaza/picnic seating area/landscaping	225,000 sf	3,275,000	625,000	3,900,000
Restrooms	3,000 sf	982,500	187,500	1,170,000
TOTAL		\$39,903,300	\$7,912,800	\$47,816,100

^a Costs assumed by the National Constitution Center.^b To be funded by park partners or private donations.



Alternative C



Draft General Management Plan
Environmental Impact Statement

Independence National Historical Park

U. S. Department of the Interior/National Park Service
391/20,082B/November 96/DSC

ON MICROFILM

ALTERNATIVE D

SITE-SPECIFIC ACTIONS

Independence Mall

Page 77, reorder paragraphs to read:

On the first block, the Liberty Bell Pavilion would remain in its current location. The block would remain essentially as it is now. An area for small special events would remain north of the pavilion, and an area for high security special events would remain south of the pavilion. The restrooms would remain.

The Mall would be treated as the primary gateway to the park and city, centering on a new regional visitor center on the third block. The National Constitution Center also could be located on this block. A driveway for dropoff and pickup of visitors to the visitor center would be added and could connect to a new underground garage for automobiles. Redesign of the block would accommodate picnicking, an area for special events that could be covered with a tent, and restrooms. A multipurpose building would be added to the third block.

On the Judge Lewis Quadrangle a new area for special events would be built. It would be called Constitution Plaza, and its location would ensure a strong visual connection with the Liberty Bell Pavilion. Restrooms accessible to the plaza would be added. The high brick walls that border the block would be removed. Sitting areas would be added at the edges, and the areas not needed for programmed uses would be landscaped.

Add to section on costs:

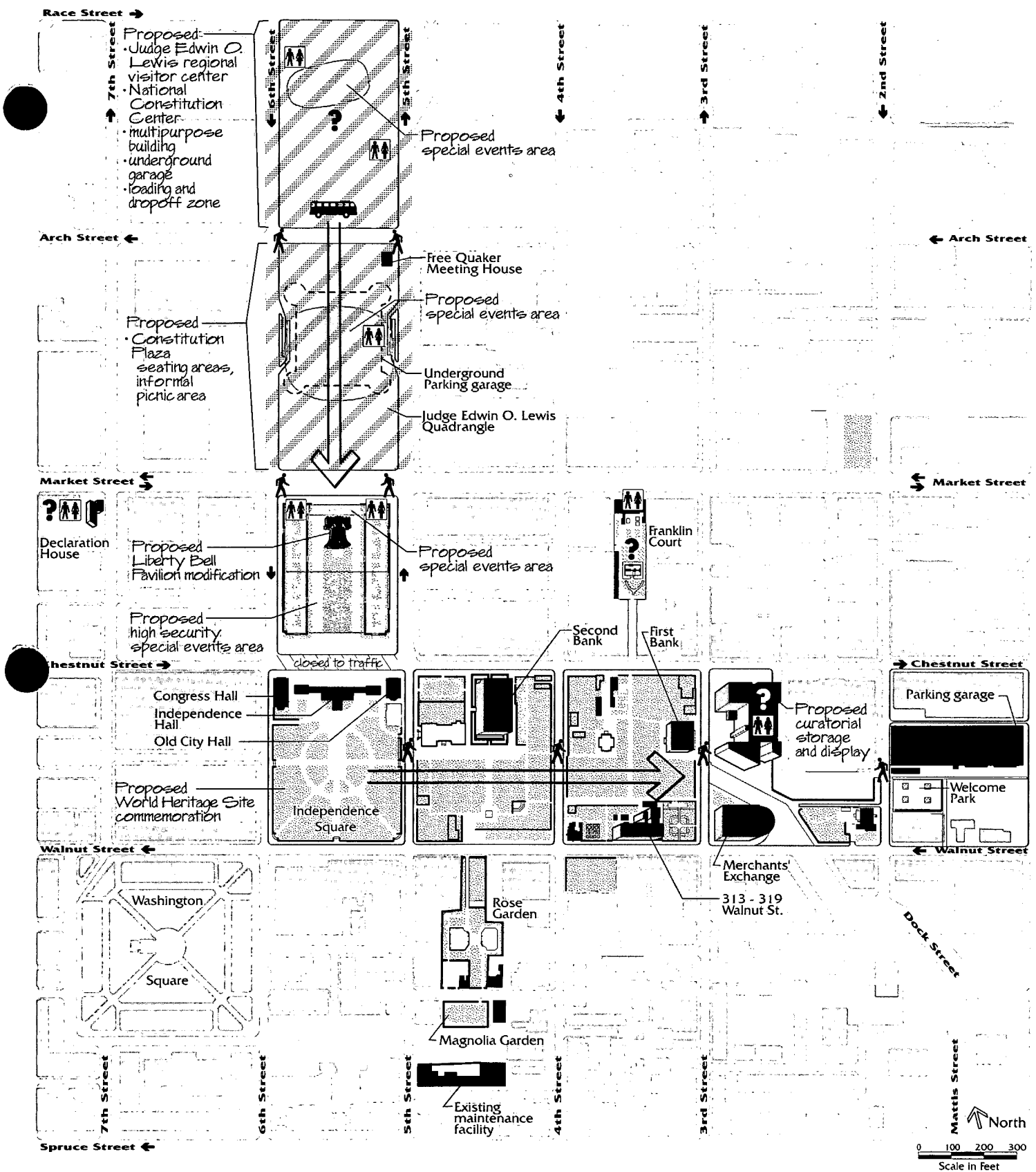
It is anticipated that operational and cyclic maintenance repair costs would for the most part remain unchanged under each of the proposed alternatives. It is projected that any proposed new structures on Independence Mall would be funded by park partners or private donations, rather than through federal appropriations. Any operational or cyclic maintenance costs for any new structures on Independence Mall (e.g., National Constitution Center, Independence Park Institute, and Gateway Visitor Center) would be the responsibility of the park partner. It is assumed that there would be little change in the operational and cyclic maintenance costs for a new Liberty Bell Pavilion over the existing structure.

Detailed design plans would be produced after the *General Management Plan* is finalized. At that time any additional operational costs associated with any redesign of Independence Mall, particularly the second block, would be identified.

TABLE 4: ALTERNATIVE D — CLASS C COST ESTIMATE

Development Item	Quantity	Gross Construction Costs	Advance and Project Planning Costs	Total Project Costs
Kiosks	4	\$83,800	\$16,000	\$99,800
Directional/information signs	20	9,200	1,700	10,900
Redesign midblock crossings (Second, Third, Fourth, Fifth Streets)	4 intersections	136,200	26,000	162,200
Remove/repair Rose Garden fountain	2	6,500	1,200	7,700
Remove/repair Magnolia Garden fountain	1	6,500	1,200	7,700
Graff House remodeling – first floor, theater, second floor	4,800 sf	503,000	96,000	599,000
First Bank — first floor conversion to exhibit space	7,100 sf	930,100	177,500	1,107,600
Rehabilitate visitor center for adaptive reuse	19,647 sf	1,572,000	300,000	1,872,000
313-319 Walnut adaptive reuse	25,845 sf	3,385,700	646,100	4,031,800
First block of Independence Mall:				
Rehabilitation of Liberty Bell Pavilion	5,576 sf	\$32,700	\$6,200	\$38,900
Second Block of Independence Mall:				
Demolition/clearing of the second block — keep Free Quaker Meeting House	254,000 sf	\$393,000	\$75,000	\$468,000
Additional restroom facilities associated with special events plaza	3,000 sf	432,300	82,500	514,800
Constitution Plaza (special events) and surrounding seating areas and landscaping	180,000 sf	3,275,000	625,000	3,900,000
Third Block of Independence Mall:				
New regional visitor center ^a	30,000 sf	\$9,432,000	\$1,800,000	\$11,232,000
Dropoff/pickup area	40,700 sf	556,700	106,200	662,900
National Constitution Center ^b				
Demolition/clearing of third block	240,500 sf	393,000	75,000	468,000
Multipurpose building	9,000 sf	1,591,700	337,500	1,929,200
Restrooms	3,000 sf	432,300	82,500	514,800
Underground parking	600 cars	5,895,000	1,125,000	7,020,000
TOTAL		\$29,053,700	\$5,578,200	\$47,816,100

^a To be funded by park partners or private donations.^b Space needs are unknown and costs cannot be determined at this time; no federal funds are anticipated.



- Park structure
- MOA properties
- Proposed action sites
- Proposed action area
- Events area
- Open space (lawn or garden)
- Visitor circulation
- Pedestrian crossing
- Bus dropoff / pickup
- Information / orientation sites
- Restrooms

Alternative D

Draft General Management Plan
Environmental Impact Statement

Independence National Historical Park

U. S. Department of the Interior/National Park Service
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ALTERNATIVE E

PARKWIDE ACTIONS

Special Use Areas

Page 82, last paragraph, change text to read:

Special events would be held on all three blocks of Independence Mall **north of the Liberty Bell Pavilion**. The **south** third of the first block would be adaptable to provide high security to accommodate visits by individuals such as heads of state **and for annual events sponsored by the city of Philadelphia**.

Circulation

Carriages and Trolleys. Page 84, change text to read: The park would work with the city to relocate the standing areas for these privately owned services **offsite**. ~~to a special lane near the entrance to the new information and orientation center on the Judge Lewis Quadrangle.~~

SITE-SPECIFIC ACTIONS

Independence Mall

Reorder paragraphs to read:

The first block would be redesigned as part of the overall Mall concept, although its basic elements of lawn, seating areas, and Liberty Bell Pavilion would remain essentially as they are now. An area for small special events would remain north of the Liberty Bell Pavilion, and an area for high security special events would be created south of the pavilion. The restrooms would remain.

The Mall would be treated as the primary gateway to the park and city, centering on a new regional visitor center on the Judge Lewis Quadrangle (the second block). A new driveway would allow loading and unloading of passengers. A new area for special events – called Constitution Plaza – would be built, and its location would ensure a strong visual connection with the Liberty Bell and Independence Hall. Restrooms accessible to the plaza would be added. Sitting areas would continue to be provided at the edges, and the areas not needed for programmed uses would be landscaped.

On the third block, a National Constitution Center could be built. Redesign of the block would accommodate an area for picnicking, an area for special events, and restrooms. A small multipurpose building would be added.

Add to section on costs:

It is anticipated that operational and cyclic maintenance repair costs would for the most part remain unchanged under each of the proposed alternatives. It is projected that any proposed new structures on Independence Mall would be funded by park partners or private donations,

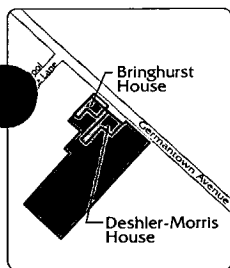
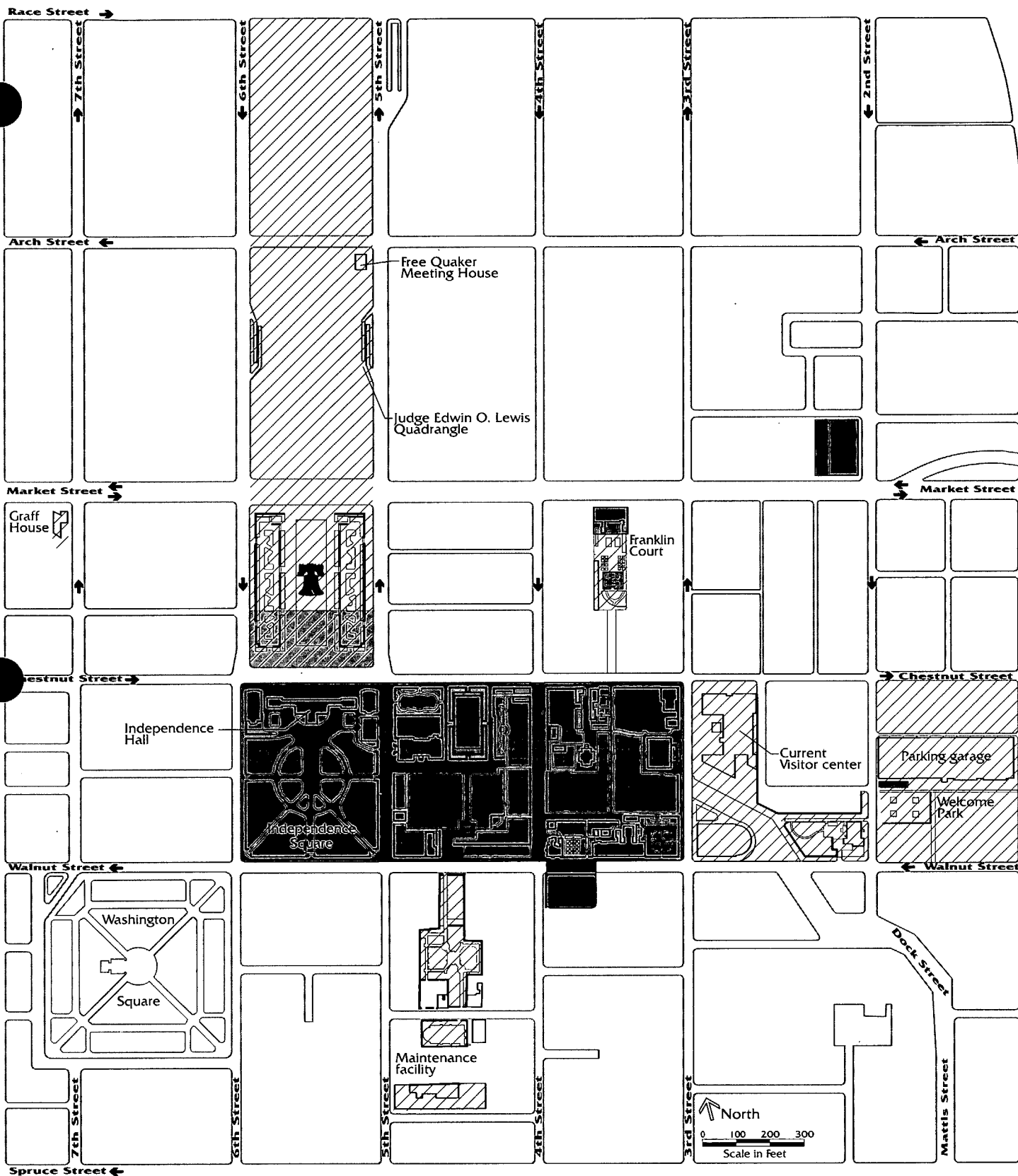
rather than through federal appropriations. With the exception of a potential new Liberty Bell Pavilion, any operational or cyclic maintenance costs for any new structures on Independence Mall (e.g., National Constitution Center, Independence Park Institute, and Gateway Visitor Center) would be the responsibility of the park partner. It is assumed that there would be little change in the operational and cyclic maintenance costs for a new Liberty Bell Pavilion over the existing structure.

Detailed design plans would be produced after the *General Management Plan* is finalized. At that time any additional operational costs associated with any redesign of Independence Mall, particularly the second block, would be identified.

TABLE 5: ALTERNATIVE E — CLASS C COST ESTIMATE

Development Item	Quantity	Gross Construction Costs	Advance and Project Planning Costs	Total Project Costs
Kiosks	4	\$83,800	\$16,000	\$99,800
Directional/information signs	20	9,200	1,700	10,900
Redesign midblock crossings (Second, Third, Fourth, Fifth Streets)	4 intersections	136,200	26,000	162,200
Remove/repair Rose Garden fountain	2	6,500	1,200	7,700
Remove/repair Magnolia Garden fountain	1	6,500	1,200	7,700
Graff House remodeling – first floor, theater, second floor	4,800 sf	503,000	96,000	599,000
First Bank — first floor conversion to exhibit space	7,100 sf	930,100	177,500	1,107,600
Rehabilitate visitor center for adaptive reuse; curatorial activities, museum storage, study collections, and visitor orientation	19,647 sf	1,572,000	300,000	1,872,000
313-319 Walnut rehabilitate for adaptive reuse	25,845 sf	3,385,700	646,100	4,031,800
First block of Independence Mall:				
New Liberty Bell Pavilion	5,576 sf	\$1,572,000	\$300,000	\$1,872,000
Second Block of Independence Mall:				
Demolition/clearing of the second block — keep Free Quaker Meeting House	254,000 sf	\$393,000	\$75,000	\$468,000
Additional restroom facilities associated with special events plaza	3,000 sf	432,300	82,500	514,800
New regional visitor center, Independence Park Institute	30,000 sf	9,432,000	1,800,000	11,232,000
Dropoff/pickup area for visitor center	40,700	556,700	106,200	662,900
Constitution Plaza (special events) and surrounding seating areas and landscaping	180,000	3,275,000	625,000	3,900,000
Third Block of Independence Mall:				
Demolition/clearing of third block	240,500 sf	\$393,000	\$75,000	\$468,000
National Constitution Center ^b				
Multipurpose building	9,000 sf	1,591,650	337,500	1,929,150
Restrooms	3,000 sf	432,300	82,500	514,800
Special events plaza	225,000	3,275,000	625,000	3,900,000
Exterior administrative parking	5 spaces	12,100	2,300	14,400
TOTAL		\$27,985,100	\$5,374,300	\$33,359,400

^a To be funded by park partners or private donations.^b Space needs are unknown and costs cannot be determined at this time; no federal funds are anticipated.



- Cultural zone
- Park development zone
- Park development/high security special events zone

Management Zoning Preferred Alternative

Draft General Management Plan
Environmental Impact Statement

Independence National Historical Park

U. S. Department of the Interior/National Park Service
391/20,076B/November 96/DSC



TABLE 6: ALTERNATIVE F — CLASS C COST ESTIMATE

Development Item	Quantity	Gross Construction Costs	Advance and Project Planning Costs	Total Project Costs
Information kiosks	4	\$83,800	\$16,000	\$99,800
Directional/information signs	20	9,200	1,700	10,900
Redesign of midblock crossings (Second, Third, Fourth, Fifth Streets)	4 intersections	136,200	26,000	162,200
Remove/repair Rose Garden fountain	2	6,500	1,200	7,700
Remove/repair Magnolia Garden fountain	1	6,500	1,200	7,700
Graff House remodeling – first floor, theater, second floor	4,800 sf	503,000	96,000	599,000
First Bank — first floor conversion to exhibit space	7,100 sf	930,100	177,500	1,107,600
313-319 Walnut — rehabilitate for adaptive reuse	25,845 sf	3,385,700	646,100	4,031,800
Rehabilitate visitor center for collections, curatorial, maintenance, and bookstore	19,647 sf	1,572,000	300,000	1,872,000
First block of Independence Mall:				
Remove Liberty Bell Pavilion	7,380 sf	\$49,800	\$9,500	\$59,300
Special events plazas, high security plaza, seating area, landscaping	180,000 sf	3,930,000	750,000	4,680,000
Second Block of Independence Mall:				
Demolition/clearing of the second block — keep Free Quaker Meeting House	600,000 sf	\$786,000	\$150,000	\$936,000
Add restrooms associated with special events plaza	3,000 sf	432,300	82,500	514,800
Constitution Plaza (special events) and surrounding seating areas and landscaping	180,000	3,275,000	625,000	3,900,000
New visitor center ^a	30,000 sf	9,432,000	1,800,000	11,232,000
National Constitution Center ^a	200,000	62,880,000	12,000,000	74,880,000
Liberty Bell Pavilion	5,000	1,572,000	300,000	1,872,000
Third Block of Independence Mall:				
Demolition/clearing of third block	240,500 sf	\$393,000	\$75,000	\$468,000
Independence Park Institute (with lodging) ^a	40,000 sf	8,908,000	1,709,000	10,617,000
Special events plaza/picnic-seating area/landscaping	225,000 sf	3,275,000	625,000	3,900,000
Dropoff/pickup area for cars and buses and entrance area to visitor center	40,700 sf	556,700	106,200	662,900
Restrooms	3,000	432,300	82,500	514,800
Parking garage for cars/buses	600 car/50 bus	10,480,000	2,000,000	12,480,000
Multipurpose building	9,000 sf	1,591,700	337,500	1,929,200
TOTAL		\$114,613,800	\$21,915,500	\$136,529,300

^a To be funded by park partners or private donations.

Add to costs section of alternative F:

It is anticipated that operational and cyclic maintenance repair costs would for the most part remain unchanged under each of the proposed alternatives. It is projected that any proposed new structures on Independence Mall would be funded by park partners or private donations, rather than through federal appropriations. With the exception of a potential new Liberty Bell Pavilion, any operational or cyclic maintenance costs for any new structures on Independence Mall (e.g., National Constitution Center, Independence Park Institute, and Gateway Visitor Center) would be the responsibility of the park partner. It is assumed that there would be little change in the operational and cyclic maintenance costs for a new Liberty Bell Pavilion over the existing structure.

Detailed design plans would be produced after the *General Management Plan* is finalized. At that time any additional operational costs associated with any redesign of Independence Mall, particularly the second block, would be identified.

IMPLEMENTATION SCHEDULE

ALTERNATIVE E

Change third entry to read:

Redesign Mall*

second block of Independence Mall

demolish/clear second block

stabilize and repair parking garage

keep Free Quaker Meeting House but remove both Free Quaker and
Hamilton Gardens

AFFECTED ENVIRONMENT

CULTURAL RESOURCES

SITE OVERVIEW

Page 113, paragraphs 2 and 3, change to read:

~~As defined by the enabling legislation, The core federal area of the park~~ consists of the three blocks between Walnut and Chestnut Streets from Second to Fifth Streets. In this area are the First and Second Banks of the United States, the Philadelphia (Merchants') Exchange, **the Franklin Court, the Locust Street Houses, the Graff House, Bishop White House, and the Todd House.**

Several privately owned properties are near or in the park. Notable among these are Carpenters' Hall, Library Hall (built in 1959), Philosophical Hall, Christ Church, Gloria Dei (Old Swede's) Church (a national historic site), and Mikveh Israel Cemetery. The Deshler-Morris House, although owned by the National Park Service, is managed by the Deshler-Morris House Committee, Inc.

CULTURAL LANDSCAPES

Page 114, paragraphs 1 and 2, change to read:

~~The NPS Mid-Atlantic Regional Office~~ **National Park Service** recently conducted a cultural landscape inventory (CLI) of the park's core area and nearby Washington Square. This first phase of investigations was undertaken to provide a broad overview of the park's character-defining features and to assess and evaluate these under the national register criteria. Among the features identified as contributing to the park's designed cultural landscape are open green spaces, vistas, enclosed gardens and courtyards, the restored and reconstructed historic structures, and the grid pattern of streets, alleys, and walkways. Small scale elements such a herringbone patterned brick paving, lampposts, brick walls with stone coping, and wrought iron gates and fencing contribute to the design intent of the commemorative landscape and provide continuity between different areas and blocks of the park.

The **National Park Service** also completed a cultural landscape report of Independence Mall (the three blocks north of Independence Hall constructed between 1954 and 1969). This area is owned, except for a portion of the first block, by the commonwealth of Pennsylvania and is under the management of the National Park Service. The Liberty Bell Pavilion (constructed in 1975) is in the first block north of Independence Hall. **The National Park Service evaluated Independence Mall** for listing on the National Register of Historic Places and found that it did not meet the criteria as a designed historic landscape nor as a nationally significant example of an urban or commemorative park. The Pennsylvania State Historic Preservation Office concurred with the finding.

COLLECTIONS AND HISTORIC OBJECTS

Paragraph 2, sentence 1, change to read: Notable objects in Independence Hall include the silver **Syng Inkstand** believed to have been used in signing the Declaration of Independence and George Washington's chair used during the Constitutional Convention.

VISITOR EXPERIENCE

VISITOR CONTACT / ORIENTATION / PARK IDENTITY / INFORMATION

Page 120, top of the page, change to read: They can enjoy the relatively quiet **commemorative landscape and the peaceful, green open areas of the park and contemplate the historic events that the park interprets**. Even though the green space is not historic in itself — this area was filled with structures during the late 18th century — it does provide a park environment in the urban area.

MUSEUMS

Page 122, first full paragraph, change to read: Some of these museum exhibits ~~are outdated or inoperable. They~~ were installed during the 1970s. Some of the exhibits do not have a direct association with the park's primary interpretive themes, while others are underused by the visiting public.

COOPERATING ASSOCIATIONS

Page 124, change to read:

The park has enjoyed a history of strong support from cooperating associations. The Independence Hall Association, which predated the park, provided the leadership that resulted in the creation of the park. Currently there are three very active cooperating associations working with the park. Eastern National Parks and Monuments Association operates the sales centers and offers quality souvenirs, publications, and an assortment of educational materials for sale. These items must meet certain criteria: they focus on the 1774–1800 time frame, deal with events and people of that time, and use the park's physical resources as a setting. The association donates funds to the park for various projects. There are five outlets in the park, including the visitor center, the printing office at Franklin Court, and the Graff House.

The Friends of Independence National Historical Park, formed in 1972, is a nonprofit organization that supports the park by acquiring historic artifacts, sponsoring interpretive and educational programs and materials, and fostering the conservation, development and interpretation of the historical resources of Independence National Historical Park.

The Independence Hall Preservation Fund was formed in 1990 to raise funds for the preservation of the park's historic resources. They seek money for an endowment for emergency repairs in the park and for special projects throughout the park on a case-by-case basis.

~~Independence Hall Preservation Fund and Independence Hall Association are also cooperating associations.~~

COOPERATIVE AGREEMENTS FOR INTERPRETATION

Page 126 and 127, change to read:

Pennsylvania Horticultural Society

This society is ~~headquartered on Walnut Street and~~ offers visitors both exhibits and a walk through a restored 18th century garden. The society has moved its offices from the Walnut Street building.

Other Congregations

Change last sentence to read: These sites include St. Joseph's Roman Catholic Church, St. George's Methodist Church, the Mikveh Israel Cemetery, Arch Street Meeting, and Gloria Dei (Old Swede's Church).

NATURAL RESOURCES

AIR QUALITY

Page 129, change to read:

In 1986-87 a program was designed to monitor the condition of the marble of the Merchants' Exchange (built in 1833-34) and evaluate the role of environmental agents on building decay (NPS 1992). Analysis of detailed stereophotogrammetric recordings indicated that the marble loss for the years between 1987 and 1991 was approximately equal to the loss for the first 150 years of the building's existence.

PARK USE AND DEVELOPMENT

Page 158, after **CONCESSIONS** heading, add:

HISTORIC LEASING PROGRAM

The Bond House is a historic structure that was acquired by the National Park Service in 1975 and rehabilitated by the lessee to NPS standards. It is operated under the Historic Leasing Program by the lessee as a bed and breakfast. The building's size, scale, and architectural features reflect the colonial period.

PLANNING PROCESS

Page 205, add: A newsletter announcing and describing the preferred alternative (alternative E) was distributed in August 1995. The *Draft General Management Plan / Environmental Impact Statement* was distributed in September 1995 and was followed by a 60-day public review and comment period. Two public meetings were held in September 1995 that were attended by a total of over 400 people. Approximately 70 letters commenting on the draft were received during the public comment period. The letters and the NPS responses to them are reproduced in Section 3 of this document.

The merit of much of the public comment as well as additional internal review and exploration led the National Park Service to revise the preferred alternative in terms of its proposals for development on Independence Mall. Titled Alternative E-1, the proposal and its impacts were described in a newsletter distributed in September 1996, and it was presented and discussed at two public meetings the same month. A 45-day public review period produced additional written comment, and these letters and the NPS response to them are reproduced in Section 4 of this document.

This *Abbreviated Final General Management Plan / Environmental Impact Statement* is the result of almost four years of study and discussion. Along with the *Draft General Management Plan / Environmental Impact Statement* it constitutes the final general management plan for the park. (Because the draft GMP/EIS was published so recently, this document does not reproduce all the information contained in the earlier document, but rather updates and corrects it.)

This plan will become final upon signature of a record of decision by the field director of the Northeast Area approximately 30 days after distribution of the plan. At that time, the planning process will be complete.

COMPLIANCE WITH FEDERAL AND STATE LAWS, EXECUTIVE ORDERS, AND REGULATIONS

CULTURAL RESOURCES

Page 207, paragraph 5, change to read:

Section 106 Compliance

Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470, et seq.) requires that federal agencies that have direct or indirect jurisdiction take into account the effect of undertakings on national register properties and allow the Advisory Council on Historic Preservation an opportunity to comment. Toward that end the National Park Service would work with the Pennsylvania State Historic Preservation Office and the advisory council to meet the requirements of 36 CFR 800 and the **September 1995** programmatic agreement among the National Conference of State Historic Preservation Officers, **the Advisory Council on Historic Preservation, and the National Park Service**. This agreement requires the **National Park Service** to work closely with the state historic preservation office and the advisory council in planning for new and existing NPS areas.

Page 208, paragraph 2, change to read:

Internally, the National Park Service will complete an Assessment of **Actions Having an Effect on Cultural Resources** form before implementation of any of the proposed actions. This is necessary to document any project effects, outline actions proposed to mitigate any effects, and document that the proposed action flows from the general management plan. All implementing actions for cultural resources would be reviewed and certified by cultural resource specialists following the **September 1995** programmatic agreement.

Page 208, at the bottom, add:

In addition more than 300 park resource studies have been completed since the 1950s. These include historic structure reports and special studies on park resources. The park does not have a historic resource study though many of the components for such a study exist, such as base maps, National Register of Historic Places nomination forms, and a cultural landscape report for Independence Mall. The park has some of the data components to complete a cultural resources base map. During the implementation phase of the preferred alternative an archeological overview and assessment would be needed. There are number of archeological maps that could expedite this task. The archeological overview and assessment could identify the need for additional archeological survey work. An ethnographic overview and assessment for the park is needed. This could build on the existing rapid ethnographic assessment procedures already completed. A cultural affiliation study is needed to identify groups with cultural ties to the park in the past and present. An administrative history has been completed for the park and portions of the cultural landscape report for Independence Mall contains materials relevant to an administrative history. However, an updating of the park's administrative history could be undertaken and additional work could be done on the pre-1900 history of the area that became the park. The carrying capacity of the park's historic buildings should be addressed in a more definitive manner. During the advance planning phase of construction, additional needed studies could be identified.

Delete the table on page 209:

ACTION	COMPLIANCE REQUIREMENT
Development of Independence Mall	Requires further SHPO/ACHP review to determine effect on archeological resources
Relocation of Tea Garden and rehabilitation of area	Requires further SHPO/ACHP review to determine effect of rehabilitation on historic scene
Closing of 500 block of Chestnut Street between Independence Mall and Independence Hall to traffic	Requires SHPO/ACHP review to determine effect on historic scene
Development of kiosks and directional/information signs	Programmatic exclusion (1) erection of signs, wayside exhibits, and memorial plaques
Redesign midblock crossings (2nd, 3rd, 4th, and Fifth Streets)	Requires no further SHPO/ACHP review; will have no effect on cultural resources
Removal/repair of Rose and Magnolia garden fountains	Requires further SHPO/ACHP review to determine effect on archeological resources
Graff House interior remodeling	No further SHPO/ACHP review; property is nonhistoric contributing feature
First Bank	Requires further SHPO/ACHP review to determine if any effect on structure
Pemberton House interior remodeling	No further SHPO/ACHP review; property is nonhistoric contributing feature
313 Walnut Street rehabilitate for adaptive use	Further SHPO/ACHP review only if exterior (a contributing feature of the park's cultural landscape) is affected
Rehabilitation of visitor center for Constitution Center and adaptive reuse	No further SHPO/ACHP review; property is nonecontributing feature
Development of additional restrooms and water fountains in park	Requires further SHPO/ACHP review to determine any effect on cultural resources
Consolidation of administrative offices at Merchants' Exchange	Compliance being completed under utility rehabilitation project
Rehabilitation of Franklin Court Underground Museum	No further SHPO/ACHP review; property is nonecontributing feature
Rehabilitation of Second Bank	Compliance is being completed as part of utility rehabilitation project
Independence Square	Compliance is being completed as part of utility rehabilitation project
Adaptive use of Bringham House	Requires further SHPO/ACHP to determine any effect on historic fabric

Page 209, add text to read:

Under the terms of VI. E of the 1995 programmatic agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, the National Park Service "in consultation with the SHPO, will make a determination about which undertakings are programmatic exclusion under section IV. A and B and for all other undertakings, whether there is sufficient information about resources and potential effects of those resources to seek review and comment under 36 CFR Part 800.4-6 during the plan review process."

In December of 1996 a list of specific undertakings (see below) and the NPS' determination of how those individual undertakings relate to the 1995 programmatic agreement was presented sent to the Pennsylvania State Historic Preservation Office (PSHPO) for review. ~~Also presented included was a list of undertakings determined by the National Park Service to require additional section 106 consultation (see letter following description of alternatives. On _____, the Pennsylvania State Historic Preservation Office concurred in these determinations and requested A photocopy of the correspondence between the National Park Service and the Pennsylvania State Historic Preservation Office on the *Independence National Historical Park General Management Plan*. Printed on page ____ is a photocopy of the correspondence between the National Park Service and the Advisory Council on Historic Preservation relating to the *Independence National Historical Park General Management Plan*.~~

The following agreements were reached:

Under section I are those activities that the National Park Service believes will have no effect on historic properties. ~~covered by programmatic exclusions. These actions will require internal National Park Service section 106 compliance, including "Assessment of Actions Having an Effect on Cultural Resources" forms. Under section II, please find is a list of those undertakings that we the National Park Service believes require further consultation with the state historic preservation officer is necessary.~~

Under section II are those undertakings that are believed to be covered by programmatic exclusions as defined in stipulations IV. A and B of the 1995 programmatic agreement. Under section III is a list of undertakings that will require further consultation with the state historic preservation officer.

Section I: Activities that will have no effect on historic properties

1. Demolition of structures and site features on Independence Mall, assuming demolition will have no potential to impact archeological resources. ~~(Independence Mall was determined not eligible for listing on the National Register of Historic Places on November 29, 1993.)~~
2. Rehabilitation of underground parking garage (constructed in 1967), assuming rehabilitation will have no potential to impact archeological resources.
3. Rehabilitation of interior of Third Street visitor center (1975), assuming no significant exterior modifications.
4. Declaration (Graff) House (1975) rehabilitation, assuming no significant exterior modifications.

5. Franklin Court underground museum (1976) rehabilitation, assuming no significant exterior modifications.

Section II: Activities covered by programmatic exclusions as defined in stipulation IV. (These actions will require internal NPS section 106 compliance only, i.e., completion of "Assessment of Actions Having an Effect on Cultural Resources" forms.)

1. Transfer of Washington Square Park from the city of Philadelphia to the National Park Service (consistent with stipulation IV. B.5: "acquisition of lands for park purposes, including additions to existing parks.")

2. Redesign of midblock crossings at Second, Third, Fourth, and Fifth Streets. Use of paving materials and light signals to create safe crossing in midblock between Chestnut and Walnut Streets. Assumes no new ground disturbance (consistent with stipulation IV. B.6 "rehabilitation and widening of existing trails, walks, paths, and sidewalks within previously disturbed areas").

3. Development and placement of kiosks and erection of directional/informational signs in various areas around the park, including Welcome Park, Franklin Court vicinity (consistent with stipulation IV. B.12 "erection of signs, wayside exhibits, and memorial plaques.")

Section III: Activities requiring Additional Consultation with the Pennsylvania State Historic Preservation Officer

A. Activities on Independence Mall

Construction of new buildings, structures, or site features to house the following functions or institutions on Independence Mall:

1. Gateway Visitor Center

2. National Constitution Center and maintenance facility for vehicle, equipment, and supply storage

3. Independence Park Institute

4. Restrooms

5. Retail facilities (e.g. cafe)

6. Vehicle dropoff and pickup area

7. Gateway element involving architectural, sculpture, or landscape features

8. Enlargement of existing Liberty Bell Pavilion or construction of a new building

9. Site utilities installation (e.g., water, electricity) assuming new ground disturbance

10. Open space or spaces on Independence Mall to stage festive events, First Amendment demonstrations, and picnics

11. Site development in/around Free Quaker Meeting House

B. Activities within Independence National Historical Park, excluding Independence Mall

1. Closure of 500 block of Chestnut Street to vehicular traffic, if federal permit is necessary

2. Second Bank rehabilitation

3. First Bank rehabilitation

4. Merchants Exchange rehabilitation

5. 313-319 Walnut Street rehabilitation

6. Brighthurst House rehabilitation

7. Independence Hall and related buildings rehabilitation

8. Deshler-Morris House rehabilitation

APPENDIX A: LEGISLATION

An Act To provide for the establishment of the Independence National Historical Park, and for other purposes, approved June 28, 1948 (62 Stat. 1661)

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That, for the purpose of preserving for the benefit of the American people as a national historical park certain historical structures and properties of outstanding national significance located in Philadelphia, Pennsylvania, and associated with the American Revolution and the founding and growth of the United States, the Secretary of the Interior, following the consummation of agreements with the city of Philadelphia and the Carpenters' Company of Philadelphia as prescribed in section 2 of this Act, is authorized to acquire by donation or with donated funds, or to acquire by purchase, any property, real or personal, within the following-described areas, such park to be fully established as the "Independence National Historical Park" when, in the opinion of the Secretary, title to sufficient of the lands and interests in lands within such areas, shall be vested in the United States: *Provided*, That the park shall not be established until title to the First United States Bank property, the Merchants' Exchange property, the Bishop White house, the Dilworth-Todd-Moylan house, and the site of the Benjamin Franklin house, together with two-thirds of the remaining lands and interests in lands within the following-described areas, shall have been vested in the United States:

Independence
National
Historical
Park, Pa.

Infra.
Acquisition of
property.

Restriction.

"Project A."

(a) An area of three city blocks bounded generally by Walnut Street, Fifth Street, Chestnut Street, and Second Street, but excluding the new United States customhouse at the southeast corner of Second and Chestnut Streets, identified as "project A", as described in the report of the Philadelphia National Shrines Park Commission, dated December 29, 1947.

"Project B."

(b) A memorial thoroughfare, or mall, extending generally from the south side of Walnut Street to the north side of Manning Street, identified as part of "project B" in the report of the Commission.

"Project C."

(c) The site of the residence of Benjamin Franklin, and related grounds, comprising approximately a one-hundred-foot-wide strip, extending southward from Market Street approximately three hundred feet between Third and Fourth Streets, and encompassing a portion of Orianna Street, identified as "project C" in the report of the Commission.

"Project E."

(d) Certain land and buildings immediately adjacent to Christ Church, situated on the west side of Second Street, and north of Market Street, identified as "project E" in the report of the Commission: *Provided*, That the Secretary of the Interior first enter into an agreement with the proprietor or proprietors of said property (Christ Church), said agreement to contain the usual and customary provisions for the protection of the property, assuring its physical maintenance as a national shrine, without any limitation or control over its use for customary church purposes. (16 U.S.C. § 407m as amended. See pp. 214, 216-217.)

Agreement
with proprie-
tors of Christ
Church.

SEC. 2. In furtherance of the general purposes of this Act as prescribed in section 1 hereof, the Secretary of the Interior is authorized to enter into cooperative agreements with the city of Philadelphia to assist in the preservation and interpretation of the property known as the Independence Hall National Historic Site and with the Carpenters' Company of Philadelphia to assist in the preservation and interpretation of Carpenters' Hall, in connection with the Independence National Historical Park. Such agreements shall contain, but shall not be limited to, provisions that the Secretary of the Interior, through the National Park Service, shall have right of access at all reasonable times to all public portions of the property now within Independence Hall National Historic Site and to Carpenters' Hall for the purpose of conducting visitors through such buildings and grounds and interpreting them to the public, that no changes or alterations shall be made in the property within the Independence Hall National Historic Site, including its buildings and grounds, or in Carpenters' Hall, except by mutual agreement between the Secretary of the Interior and the other parties to the contracts. (16 U.S.C. § 407n.)

SEC. 3. The Secretary of the Interior, in his discretion, is authorized to construct upon a portion of the land described in section 1 of this Act, or upon other land that may be donated for such purpose, which property he is hereby authorized to accept, such offices and administration buildings as he may deem advisable, together with a suitable auditorium for the interpretation of the historical features of the national historical park. The Secretary of the Interior is also authorized to accept donations of property of national historical significance located in the city of Philadelphia which the Secretary may deem proper for administration as part of the Independence National Historical Park. Any property donated for the purposes of this section shall become a part of the park, following its establishment, upon acceptance by the United States of title to such donated property. (16 U.S.C. § 407o as amended. See p. 215.)

Construction of
offices, etc.

Acceptance of
donations.

SEC. 4. The Secretary of the Interior is authorized, in his discretion, to establish a suitable advisory commission of not to exceed eleven members. The members of the advisory commission shall be appointed by the Secretary of the Interior, with three members to be recommended by the Governor of Pennsylvania, three by the mayor of Philadelphia, and one each by the Carpenters' Company of Philadelphia and the Independence Hall Association.

Advisory com-
mission.

The functions of the advisory commission shall be to render advice to the Secretary of the Interior, from time to time, upon matters which the Secretary of the Interior may refer to them for consideration. (16 U.S.C. § 407p.)

Functions.

SEC. 5. The administration, protection, and development of the park shall be exercised under the direction of the Secretary of the Interior by the National Park Service, subject to the provisions of the Act of August 25, 1916 (39 Stat. 535; 16 U.S.C. 1-4), as amended and supplemented, and the Historic Sites Act of August 21, 1935 (49 Stat. 666; 16 U.S.C. 461-467). (16 U.S.C. § 407q.)

SEC. 6. For the purpose of acquiring the property described in section 1 of this Act, there is hereby authorized to be appropriated not to exceed the sum of \$4,485,000. Funds appropriated pursuant to this Act shall be available for any expenses incidental to acquisition of property as prescribed by this Act, including the employment of the necessary services in the District of Columbia, and including to the extent deemed necessary by the Secretary of the Interior, the employment without regard to the civil-service laws or the Classification Act of 1923, as amended, of such experts and other officers and employees as are necessary to carry out the provisions of this Act efficiently and in the public interest. (16 U.S.C. § 407r as amended. See pp. 215, 217.)

Appropriation
authorized.

APPENDIX B: DESCRIPTION AND CURRENT USES OF PARK STRUCTURES

All of the features listed in this appendix are listed on the National Register of Historic Places for Independence National Historical Park. The thematic outline used here, in a slightly modified form, will be the same as developed for the 1988 National Register of Historic Places – Nomination Form. This listing does not contain every feature noted on the national register form, but highlights those of importance to the general management plan.

I. Founding and Growth of the United States, 1774–1800

The historic structures, objects, sites, and places and the nonhistoric reconstructions that make up this theme all have links to the political establishment, growth, and stabilization of the nation. The theme also includes all structures associated with those individuals who served the early national government.

A. Historic Structures, Objects, and Sites

1. Independence Hall

The World Heritage Convention of the United Nations designated this building as a world heritage site. The first two floors are historically refurnished for visitor use. The original building was constructed between 1732 and 1757. The current version of the tower was built in 1828. The National Park Service is currently undertaking renovation in conjunction with utility improvements. The hall and the east and west wings will continue to be used for exhibits. The Hall is historically refurnished.

2. Congress Hall

The first and second floors are open to the public. Congress Hall originally was constructed between 1787 and 1789 and was extended to the south in 1793. The National Park Service conducted renovation and restoration work here between 1959 and 1962. The hall will continue to be historically refurnished. The National Park Service is currently undertaking renovation in conjunction with utility improvements.

3. Old City Hall

The first floor contains exhibits on the city of Philadelphia and the Supreme Court. The structure was built in 1790–1791. The National Park Service rehabilitated the building between 1960 and 1972. Additional utility improvements and building renovation was completed in 1996. The hall will continue to be historically refurnished.

4. Free Quaker Meeting House

This building was constructed in about 1783. The last major restoration was done in 1968. The exterior is maintained by the National Park Service and the interior is operated as a headquarters and museum by the Junior League of Philadelphia. The structure will continue to be used as a museum.

5. First Bank of the United States

This building was completed in 1797 and most recently renovated in 1974-76. The building's exterior was restored to its 18th century appearance. The interior reflects the 1902 remodeling with the adaptive use features of the 1974-76 work. The ground floor is a single large space that is used for special events and will be used for permanent and changing exhibits. The upper floor houses park offices.

6. Bishop White House, 309 Walnut Street

The Bishop White house was constructed in 1787 and was most recently renovated in 1962. Both the interior and exterior have been restored to their late 18th century and early 19th century appearance. The building is a historic house museum, and the first, second, and third floors are open to the public. This structure will continue to be used as a historically refurnished house for visitor use.

7. Carpenters' Hall

This building was constructed in 1770-71. Independence National Historical Park has a memorandum of agreement with the Carpenters' Company of Philadelphia for the site's preservation. The first floor is used for exhibits and a bookstore. Administrative facilities are on the second floor.

8. Deshler-Morris House

The National Park Service restored this structure in 1974-76 to reflect its appearance when President George Washington briefly occupied it. This structure will continue to be used as a historically refurnished house for visitor use.

B. Nonhistoric Contributing Features

1. Declaration (Graff) House, 700 Market Street

The National Park Service reconstructed this 3-story building in 1975. The exterior reconstruction was based on the 18th century structure and on structural features found in typical early 19th century structures. Two rooms on the second floor were restored to the period when Thomas Jefferson lived there and the first, third, and garret floors were adapted for exhibits and staff use. This structure will continue to be used for exhibits, historical furnishings, and offices.

2. City Tavern

The National Park Service demolished the 4-story Seamans' Institute building on this site in 1958. In its place the National Park Service reconstructed City Tavern and City Tavern Necessary, which stood at this site from 1714 to 1854. The present City Tavern was completed in 1975. The reconstruction stands on the historic site of the original structure. It is used as a concession-operated restaurant.

3. New Hall

This feature is significant for the site and not for the reconstructed building. The building was constructed in 1791 and demolished in 1958. The following year it was reconstructed. The exterior reflects its original appearance and the interior serves as a museum space. The reconstruction stands on the historic site of the original structure. The building is used for museum exhibits.

II. Philadelphia, Capital City, 1774–1800

This theme identifies the cultural features in the park that contributed the choice of Philadelphia as the nation's capital during the late 18th century.

A. Historic Structures and Places

1. Todd House, 343 Walnut Street

The building was constructed in 1775 and was most recently renovated in 1961–63 to its 1791–93 appearance. The first two floors are preserved as a museum that reflects 18th century middle class houses in Philadelphia. This structure will continue to be historically refurnished for visitor use.

2. 408 Locust Street

This structure was constructed in 1763 and the last major restoration was done in 1963. The exterior was restored to its 18th century appearance and interior is adaptively used for employee housing. This building will continue to be used for employee housing.

3. 410 Locust Street

This structure was built in 1765 and the last major restoration was completed in 1960. The exterior was restored to the 18th century appearance and interior was used for employee housing. This building will continue to be adaptively used for employee housing.

4. and 5. Quadraplex 230 and 232 Liethgow Street, 413 and 415 Locust Street

These properties were constructed in 1802–04. The National Park Service restored the exterior in 1960 and remodeled the interior into four apartments for employees. This use will continue.

6. 421 Locust Street

This house was constructed in 1785–76. The National Park Service restored the exterior in 1960s, using the interior adaptively for employee quarters. This use will continue.

7. 423 Locust Street

This structure was constructed in 1803–07. The exterior was last restored in 1963 and the interior is adaptively used as employee quarters. This use will continue.

8. Bond House

This structure is in the Old City Historic District. The National Park Service acquired this building in 1975. It has been adaptively restored to an 18th century appearance and currently serves as a bed and breakfast. This use will continue.

B. Nonhistoric Contributing Features

1. Pemberton House

The original building was constructed in 1775 and demolished in the 19th century. The building's exterior was reconstructed in 1967. The interior was designed to house museum exhibits on the first and second floor with a classroom or assembly area in the cellar. No historic fabric remains in the interior. The structure will be used as a bookstore until a new visitor center is constructed.

2. Hibbard-Griffitts-Marshall Houses, 339-341 Walnut Street

The original two row houses were constructed in the mid-1770s and were demolished in 1957. In 1963 conjectural reconstructions were built to stabilize the Todd House and to add to the historic scene. The buildings' interiors are used as park offices. This structure will continue to be adaptively used by the park for various purposes.

3. Park Headquarters, 311-317 Walnut Street

These buildings were built partially in 1791 and 1900. The exterior combines a restoration of the McIlvaine house at 315-317 and a conjectural reconstruction of the building at 311-317, done in 1963–65. The reconstruction used portions of a 5-story concrete structure. The exterior is a restoration of the 19th-century facades and a conjectural reconstruction of the rear wing. The interior was designed for park offices. The use of these buildings varies by alternative.

4. 319-325 Walnut Street

These properties are the Fling house (319 Walnut) and the Kidd houses (323-325 Walnut). These buildings are classified as nonhistoric contributing features. The three row houses were built in 1810–12 and 1825–40. In 1963 the National Park Service restored and reconstructed the exteriors to contribute to the historic scene. The interiors were designed to serve as offices. The Independence Park Institute and the Philadelphia School District classroom temporarily occupy this space pending construction of new facilities on the Mall. This structure will continue to be adaptively used by the park.

5. Library Hall

In 1957 and 1958 the American Philosophical Society, by permit from the National Park Service, constructed a building on the northeast corner of Library Street and Fifth Street, opposite their headquarters at Fifth and Chestnut Streets, to house the society's expanding library and archives. The front section of the building reproduces the 1790 structure called Library Hall, which the Library Company of Philadelphia (the oldest subscription library in the country, founded in 1731 by Benjamin Franklin) erected on approximately the same site to hold their growing collection. The original Library Hall was torn down about 1884, after the Library Company completed its relocation to new buildings closer to Center City. The Drexel building, an early high rise ten-story office building, replaced Library Hall at the corner of Fifth and Chestnut. In 1956 the park demolished the Drexel building. Library Hall has been accurately reproduced from an 1800 engraving of the building by William Birch, as well as from 19th century photographs. The two-story brick building has a Palladian design containing a five-bay facade with a central entrance and a pedimented bay of four pilasters. surrounding its hipped roof is a balustrade surmounted with urns. Two rectangular windows on the second floor flank a central niche containing a statue of Benjamin Franklin draped in a toga. The original Library Hall building was designed by Dr. William Thornton who later designed the nation's capital in Washington.

III. Benjamin Franklin

This theme identifies the structures and sites associated with Benjamin Franklin's home in Franklin Court from 1765 to his death in 1790.

A. Historic Structures and Archeological Resources

1. 314 Market Street

The National Park Service acquired the building in the 1950s. It was a 5-story brick commercial property, built about 1853, which bore no resemblance to the 3-story brick row house built on this lot in 1797. In 1975 the National Park Service reconstructed the 18th century exterior and adaptively used the building's interior for a bookstore and office space. These uses will continue.

2. 316-318 Market Street

These structures were constructed simultaneously in 1786-87 as tenant houses for Benjamin Franklin and were altered over the years. In 1974-75 the National Park Service removed the alterations and restored the exteriors. The interiors are adaptively used for exhibits on Benjamin Franklin and will continue to be used for this purpose.

3. 320 Market Street

The National Park Service purchased this property in 1955. Between 1974-76 the National Park Service restored the building to its 1804 3-story exterior appearance. The interior was designed to be adaptively used by the park. It will continue to be used for exhibits and for administrative purposes.

4. 322 Market Street

This building was completed in 1788 and has been extensively altered. From 1974–76 the National Park Service restored the exterior to its 18th century appearance. The first floor interior was restored to recreate a printing office and the upper floors were adaptively used as park offices. The interior is a re-creation designed as an exhibit and not a restoration of the building's historic interior. Its use as an exhibit space will continue.

B. Nonhistoric, Contributing

1. Franklin House Ruins

This space, with a frame of structural steel tubing outlining the "ghost" structure, serves to delineate Franklin's house site. This feature will continue as an interpretive devise.

IV. Architecture

This theme identifies the 19th century structure in the park that is significant for its architecture.

A. Historic Structure

1. Merchants' Exchange

This building was completed in 1834. In the 1960s the National Park Service renovated the interior and partially restored the exterior — the only original material remaining. The interior is being used for offices, and this use would continue. Park headquarters, the park archives, and the library will be moved into the building if the structure is deemed sufficiently strong for their weight.

2. Second Bank of the United States

The original building was constructed in 1819–24 and renovated in 1972. The first floor is adaptively used as a portrait gallery and the second floor is used for museum space, park offices, and special exhibit space. The first floor will continue to be adaptively reused for exhibits. The second floor will be used for various park administrative purposes.

B. Noncontributing Features

1. Visitor Center

The visitor center would be redesigned to house the architectural study collection and changing exhibits. It would be used for curatorial activities and visible storage of park collections. Part of the building could continue to be used for visitor orientation.

2. Maintenance Facility

This building was constructed in 1982. Its use as a maintenance structure will continue.

3. Liberty Bell Pavilion

The pavilion was constructed in 1975. The Liberty Bell itself is listed on the national register form as a historic object. The west and east restrooms at the Liberty Bell Pavilion were constructed in 1986. Depending on the alternative this structure and the west and east restrooms may be retained or removed. If replaced, the new structure would house the Liberty Bell and provide for visitor amenities.

4. Franklin Court Underground Museum

In 1974 the area around Benjamin Franklin's house ruins was developed as exhibit space. This space will continue to be used as a museum.

5. Bringhurst House and Quarters

The building was constructed in the 1750s and has been altered inside and out. This structure will be used for employee quarters and as a staging area for tours of the Deshler-Morris House.

APPENDIX D: CARRYING CAPACITY

No formal studies of the carrying capacity of Independence National Historical Park or individual structures in the park meeting the requirements of Section 604 of Public Law 95-625 have been undertaken. Fire safety occupancy limits have not been established by the Philadelphia Fire Department. Over the years, however, members of the park staff have limited visitor use in structures with high visitor interest based on the ability of the staff to effectively interpret and protect the resources while monitoring the visitor needs. The park has also limited building and site occupancies based on NFPA 101, the life safety codes.

Only Independence Hall, Congress Hall, and the Liberty Bell Pavilion regularly require the limiting of building capacity.

Independence Hall. During prime visiting hours, up to three groups of 85 at a time are guided through the Court Room, Assembly Room, and the Long Gallery. A maximum of 10 people are allowed in the tower at any one time.

Congress Hall. Visitors are held at the door of the House Chamber while presentations are underway. Special events are limited to 150 people.

Liberty Bell Pavilion. Space and visitor comfort are the limiting factors. No more than 100 visitors are allowed in the pavilion at one time. Events in front of the pavilion are limited to 75 people.

Rarely does visitation in other structures require enforcement of identified capacities.

Old City Hall. Attendance is limited to 90 people.

West Wing Independence Hall (VIP Room). The use of the room is limited to a maximum of 25 people.

Todd and Bishop White Houses. Very small rooms with significant resources require limiting visitation to groups of 10 people at a time, the number that can reasonably be monitored by ranger staff.

Second Bank. Staff may hold large groups such as school children back while other visitors are in the gallery so that staff may more easily monitor visitor activity. Visitation to the second floor south is limited to 100 people.

New Hall Military Museum. Visitation on the second floor limited to 50 people at a time due to its single egress.

First Bank. All permits are limited to a maximum of 250 people (first floor) and 20 people in the conference room.

Franklin Court. Attendance is capped at a combined 230 people for the court and the museum.

Visitor Center. A maximum of 300 people are permitted in the visitor center at any one time.

APPENDIX E: CORRESPONDENCE WITH THE
STATE HISTORIC PRESERVATION OFFICER



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

DEC 1 1996

H30(INDE-CRM)

Brent D. Glass
Executive Director
State Historic Preservation Officer
Pennsylvania Historical & Museum Commission
P. O. Box 1026
Harrisburg, PA 17108-1026

Dear Dr. Glass:

The National Park Service continues to work toward the completion and implementation of a General Management Plan/Environmental Impact Statement for Independence National Historical Park. Your office has received a copy of the draft General Management Plan/Environmental Impact Statement (GMP/EIS) and the September 1996 newsletter which detailed a revised preferred alternative. At this time we are enclosing the *Abbreviated Final General Plan/Environmental Impact Statement*. Because the implementation of the plan will have an effect on properties presently listed on the National Register of Historic Places, we would like to take this opportunity to clarify our previous discussion on undertakings subject to review under Section 106 review.

Under the terms of V.I.E of the 1995 Programmatic Agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, the National Park Service, "in consultation with the SHPO, will make a determination about which undertakings are programmatic exclusions under IV.A and B, and for all other undertakings, whether there is sufficient information about resources and potential effects on those resources to seek review and comment under 36 CFR 800.4-6 during the plan review process."

Proposed undertakings for Independence National Historical Park are discussed the enclosed *Abbreviated Final General Plan/Environmental Impact Statement* in "Alternative E-1: Proposed Action" on pages 6-14. Below is a list of the specific undertakings discussed by the plan, as well as the National Park Service's determination of how those individual undertakings relate to the 1995 Programmatic Agreement.

Under Section I, please find those activities that we believe will have no effect on historic properties.

Under Section II, please find those undertakings that we believe are covered by "programmatic exclusions" as defined in Stipulations IV.A and IV.B of the 1995 Programmatic Agreement. Under Section III, please find a list of undertakings that we believe will require further consultation with the State Historic Preservation Officer.

Section I: Activities that will have no effect on historic properties.

1. Demolition of structures and site features on Independence Mall, assuming demolition will have no potential to impact archeological resources. (Independence Mall determined not eligible for listing on the National Register of Historic Places, November 29, 1993.)
2. Rehabilitation of underground parking garage (constructed, 1967) on Independence Mall, assuming rehabilitation will have no potential to impact archeological resources.
3. Rehabilitation of interior of Third Street Visitor Center (1975), assuming no significant exterior modifications.
4. Declaration (Graft) House (1975) rehabilitation, assuming no significant exterior modifications.
5. Franklin Court Underground Museum (1976) rehabilitation, assuming no significant exterior modifications.

Section II: Activities covered by "programmatic exclusions" as defined in Stipulation IV.

(These actions will require internal National Park Service Section 106 compliance, only, i.e. completion of "Assessment of Actions Having an Effect on Cultural Resources" forms.)

1. Transfer of Washington Square Park from City of Philadelphia to National Park Service (Consistent with Stipulation IV.B.5: "acquisition of lands for park purposes, including additions to existing parks.")
2. Redesign of mid-block crossings at Second, Third, Fourth, Fifth Streets : Use of paving materials and light signals to create safe crossing in mid-block between Chestnut and Walnut Streets. Assumes no new ground disturbance. (Consistent with Stipulation IV.B.6 "rehabilitation and widening of existing trails, walks, paths, and sidewalks within previously disturbed areas" and Stipulation IV.B.7 "repaving of existing roads or existing parking areas within previously disturbed areas.").
3. Development and placement of kiosks and erection of directional/informational signs in various areas around the park, including Welcome Park, Franklin Court vicinity: (Consistent with Stipulation IV.B.12: "erection of signs, wayside exhibits, and memorial plaques."

Section III: Activities requiring Additional Consultation with SHPO.

A. Activities on Independence Mall:

Construction of new buildings, structures or site features to house the following functions or institutions on Independence Mall:

1. Gateway Visitor Center.
2. National Constitution Center and maintenance facility for vehicle, equipment and supply storage.
3. Independence Park Institute.
4. Restrooms.
5. Retail facilities (e.g. cafe).
6. Vehicle drop-off & pick-up area.
7. Gateway element involving architectural, sculpture or landscape features.
8. Enlargement of existing Liberty Bell Pavilion or construction of new building.
9. Site utilities installation (e.g. water, electricity) assuming new ground disturbance.
10. Open space or spaces on Independence Mall to stage festive events, First Amendment demonstrations, and picnics.
11. Site development in/around Free Quaker Meeting House.

B. Activities within Independence NHP, excluding Independence Mall:

1. Closure of 500 block of Chestnut Street to vehicular traffic, if federal permit is necessary.
2. Second Bank rehabilitation.
3. First Bank rehabilitation
4. Merchants Exchange rehabilitation.
5. 313-319 Walnut Street rehabilitation.
6. Brighthurst House rehabilitation.
7. Independence Hall and related buildings rehabilitation.

Thank you for your sustained participation in the General Management Plan planning process here at Independence NHP. We look forward to receiving your comments regarding the above determinations. Please continue to address your Section 106 comments and concerns to Chief Historian, Diann Jacox. Ms. Jacox may be reached at (215) 597-7127.

Sincerely,

SIGNED

Martha B. Aikens,
Superintendent
Independence National Historical Park

Enclosure

cc:
Advisory Council on Historic Preservation w/enclosure

bcc:

INDE, Jacox Reading File (Jacox/Willis)

INDE, Independence GMP Section 106 compliance file

INDE, Doris Fanelli

CHSO/ALSO, Deirdre Gibson

DSC-RP, Joan DeGraff

DSC-RP, Frank Willis

DSC-RP, Cellar



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Post Office Box 1026
Harrisburg, Pennsylvania 17108-1026

January 31, 1997

Martha B. Aikens, Superintendent
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

INDEPENDENCE NATIONAL HISTORICAL PARK
NHP REFERENCE NUMBER

Re: ER 93-2618-101-U
NPS: Independence National Historical Park
Philadelphia: Proposed Undertakings under the
Programmatic Memorandum of Agreement

Dear Ms. Aikens:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation. These requirements include consideration of the project's potential effect upon both historic and archaeological resources.

We are writing in reference to your letter of December 15, 1996 concerning potential work activities and the proposed review levels as per the Programmatic Memorandum of Agreement. We have reviewed the list of proposed work activities and agree with the methods by which they will be reviewed.

If you need further information in this matter please consult Ann Safley at (717) 783-8946.

Sincerely,

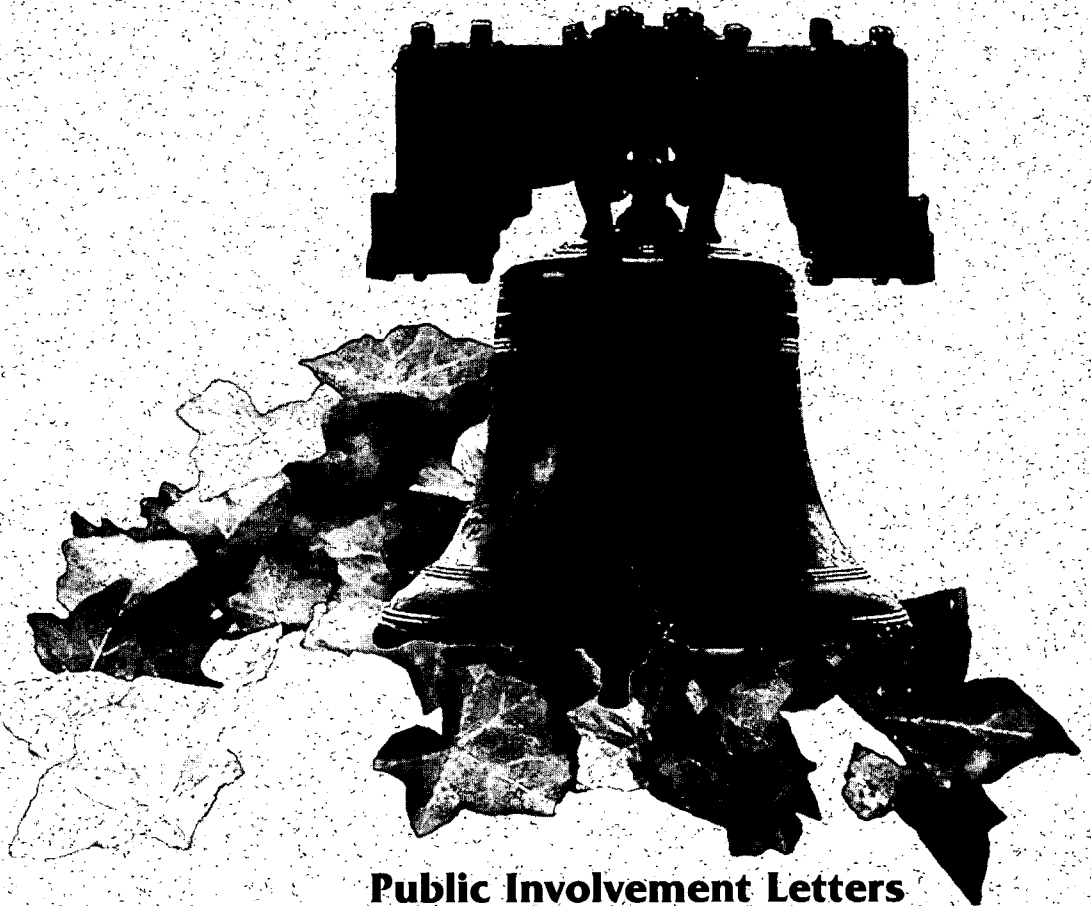
A handwritten signature in black ink, appearing to read "Brenda Barrett".

Brenda Barrett
Director

BB/smz



Section 4



**Public Involvement Letters
Draft General Management Plan
Environmental Impact Statement**

SECTION 4 PUBLIC INVOLVEMENT LETTERS

Under the National Environmental Policy Act of 1969, the National Park Service is required to seek the comments of government agencies, organizations, and the public with regard to actions proposed by the agency. This is done through newsletters, public meetings, and public review of planning documents. All three methods were employed during development of the *Independence National Historical Park General Management Plan*.

During public review, written comments were provided to the National Park Service by federal, state, and city government agencies; by organizations; and by individuals. All the letters that were received regarding the plan are reproduced here in that order along with corresponding National Park Service responses. Not all comments required a response. Private addresses and phone numbers have been blacked out in the document to preserve the privacy of individual citizens.

RESPONSES

COMMENTS

NOV-09-95 THU 07:52 NPS DSC TEA PB FAX NO. 303 989 8966 P. 02
11/09/95 12:40 2133876100 EPA REGION III Q002



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

November 8, 1995

Ms. Martha Z. Aikens, Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, Pennsylvania 19106

RE: Draft General Management Plan and Environmental Impact
Statement for Independence National Historical Park,
Pennsylvania

Dear Ms. Aikens:

In accordance with the National Environmental Policy Act
(NEPA) and Section 309 of the Clean Air Act, the U.S.
Environmental Protection Agency (EPA) has reviewed the Draft
General Management Plan and Environmental Impact Statement (EIS)
for Independence National Historical Park.

Based on our review of this Draft EIS, we have rated the
project LO (Lack of Objections). This rating indicates that our
review has not identified any potential environmental impacts
requiring substantive changes to the proposal (see enclosed
Summary of Rating Definitions).

We appreciate the opportunity to comment on this Draft EIS.
If you have any questions feel free to contact me at 215-597-
1177.

Sincerely,

Ray E. Denmark, Jr.
Ray E. Denmark, Jr.
NEPA Program Manager

Enclosure

COMMENTS



National Trust for Historic Preservation

1785 Massachusetts Avenue, N.W.
Washington, D.C. 20036
(202) 673-4000 / FAX (202) 673-4038

November 5, 1995

Ms. Martha Aikens
Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

Dear Ms. Aikens:

Congratulations on the *Draft General Management Plan / Environmental Impact Statement* for Independence National Historical Park. The plan reestablishes the National Park Service's dedication to a quality visitor experience and the proper protection of our Nation's historical treasures. As you wrap up the public comment phase of this Draft Planning Period, we at the National Trust for Historic Preservation wish to offer our thoughts for your consideration.

An important philosophy of this *Draft Management Plan* (DMP) is the National Park Service's willingness to integrate the many components of Independence National Historical Park within the greater community of both modern and historic Philadelphia. Integration has the potential to lead to several exciting opportunities for the park and the city. As part of this new philosophy, the DMP outlines a fresh approach for making Federal lands available for specific uses—uses led by non-Federal investment, in cooperation with the stewardship of the Park Service. In this era of dwindling resources, it is encouraging to see an established agency seeking innovative partnerships and creative ways of accomplishing its mission. This aspect of the DMP is an important accomplishment, and we urge you to retain it as an organizing principle.

It is our understanding that this DMP is intended as a managerial blueprint, by which future design decisions will be guided. As such it is proper to incorporate certain representative illustrations tied to the specifics of new facilities proposed under the plan. Illustrations can be as alarming, however, as they are helpful. The inclusion of such images can be confusing to the public, giving the impression that commitments have been made to ideas that are, in fact, only conceptual. Thus, while we recognize that the actual placement and design phase is yet to come, we would discourage any above ground siting of storage/maintenance facilities on any of the centerpiece blocks of Independence National Historical Park.

The mission of the National Trust for Historic Preservation is to foster an appreciation of the diverse character and meaning of our American cultural heritage and to preserve and revitalize the livability of our communities by leading the nation in saving America's historic environments.

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RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY, REFER TO:

D18 (INDE)

January 22, 1996

Mr. Richard Moe
President
National Trust for Historic Preservation
1785 Massachusetts Avenue, N.W.
Washington, D.C. 20036

Dear Mr. Moe:

Thank you very much for your encouraging letter regarding the General Management Plan for Independence National Historical Park. I am delighted that you have focused on the core vision of the plan: preservation, interpretation, and better integration of the park with the community.

As you note, a number of comments have been received expressing concern over the multi-purpose building intended for the third block of Independence Mall. The extensive amount of new development proposed in the preferred alternative could not be adequately serviced from existing storage and maintenance facilities. It would be short-sighted on our part to fail to provide a facility that allows us to make the most efficient use of available staff and materials. Please be reassured, however, that no stand-alone building for storage and maintenance would be seen by users of the mall or people driving by on adjacent streets. The precise design treatment, location, size, and configuration of this structure would be determined in upcoming design studies, and shared with the public at that time.

We strongly agree that a number of questions on urban design issues remain to be answered for the mall. This year, we hope to initiate a conceptual design process that will be open for public participation.

Thank you again for your support of the national parks.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

RESPONSES

COMMENTS

Martha Aikens
INHP Draft Management Plan
November 3, 1995
Page 2

As you know, this aspect of the management plan has aroused great public consternation and has been a lightning rod for criticism. We agree with many of those expressing concern that it would be inappropriate to place a storage facility on the third block of the mall. We believe, however, that focus on this particular aspect of the plan has, unfortunately, distracted attention away from its many meritorious elements.

Currently, the Preferred Alternative demonstrates a sensitivity to the potential for the mall as a gateway for visitors. It is critical that you avoid undermining the visitor's first impression. We encourage you to work with the City of Philadelphia and knowledgeable community organizations to develop a specific design which retains the beauty and function of William Penn's planned city, at the same time that it upholds the potential for the mall as a ceremonial centerpiece. Final design decisions must incorporate appropriate city planning considerations in order to best accomplish the integration you seek to achieve through a new management philosophy.

With warmest regards,

Sincerely,


Richard Moe
President

COMMENTS



October 20, 1995

Martha Aikens, Superintendent
Independence National Historic Park
313 Walnut Street
Philadelphia, PA 19106

Dear Martha:

Thank you for the opportunity to speak at the public meeting concerning the Draft General Management Plan for Independence National Historic Park on October 6th. We at SEPTA are hopeful that some modifications can be made to the preferred alternative which will allow for the continued movement of transit vehicles, on which so many depend, through the park area.

I have enclosed a printed copy of my testimony for your records as was requested by Deirdre Gibson of your staff.

Again, thank you for your consideration of SEPTA's position.

Sincerely,
Jim Conklin
Jim Conklin
Senior Operations
Planner, City Route &
Service Planning

JC\hos
W\Enclosure

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY, REFER TO:

D18 (INDE)

January 22, 1996

Mr. James Conklin, Senior Operations Planner
Southeastern Pennsylvania Transportation
Authority
Attn: City Route and Service Planning
1234 Market Street
Philadelphia, PA 19107

Dear Mr. Conklin:

Thank you for sending a written copy of the testimony you presented during the October 5 public meeting. I appreciate your perspective and the information you have provided. We will be in touch to discuss these issues further.

Sincerely,

Martha E. Aikens
Martha E. Aikens
Superintendent

RESPONSES

COMMENTS

SEPTA RESPONSE TO THE PROPOSED CLOSURE OF THE 500 CHESTNUT STREET
PUBLIC MEETING - FRIDAY, OCTOBER 6, 1995
INDEPENDENCE NATIONAL PARK VISITOR CENTER

Good afternoon, my name is Jim Conklin. I am a Senior Operations Planner for SEPTA. SEPTA has read the general management plan for Independence National Historic Park with great interest. Although SEPTA is certainly supportive of the efforts planned to assure the maintenance of this invaluable national treasure, and those geared toward enhancing the attractiveness of the historic area to tourists and visitors, we are prepared to comment on the plan only as we see it potentially affecting transit. We are particularly concerned with the impact which we feel that the proposed closure of the 500 block of Chestnut Street would have. We are opposed to the closure which is recommended in the preferred alternative and are asking that the National Park Service reconsider this element of the proposal.

SEPTA's responsibility to the region is to facilitate mobility by providing the highest levels and quality of transit possible with available resources. We operate a high level of surface transit in the downtown area and a good portion of this service would be compromised, either directly or indirectly, by the closure of Chestnut Street.

The basis of our objections fall into three areas: inconvenience to our passengers, increased operating costs, and reduced

RESPONSES

COMMENTS

reliability of the downtown bus network. About 2,500 passengers daily travel through Independence National Park on Routes 9, 21, and 42. All of these people would suffer either increased travel time, increased walking distance to and from transit access, or both. Additionally, the quadrant is a destination of, and utilized as a turnaround for Routes 12, 38, 44 and 121. To the extent that these services would need to be re-routed away from Chestnut Street, other passengers would be inconvenienced.

The addition of even a few blocks for each of the affected routes would add time to the schedule and distance to each trip, which when compounded over the course of a year, would increase operating costs between 1/4 and 1/2 million dollars. Because transit allocations are steadily declining, these increases would necessarily be offset by decreases in service levels system wide.

In terms of traffic volume, absent a dramatic decrease in traffic in the northeast quadrant of Center City, the closure of Chestnut Street would re-direct thousands of vehicles daily to North Seventh, Sixth, and Fourth Streets and to ill-suited parallel Streets. The increases in volume on these streets would exacerbate already serious traffic jams which are common to the PM rush period. The spillover detriment for SEPTA and transit passengers would be increased non-productive dwell time on crowded streets and longer overall trip times for routes originating in or passing through Center City. Longer trip times negatively impact bus cycle times which denigrate the quality of service and ultimately result

RESPONSES

COMMENTS

in a reduction of service. At a time when SEPTA, like most transit agencies, is struggling to maintain existing patronage and attract riders, we can ill afford to reduce service.

It is our understanding that the City of Philadelphia, recognizing the potential problems which would arise from the closure of Chestnut Street, would like to further explore this issue. Although SEPTA doesn't have a recommendation for a plan which would meet all of the objectives of the Park Service, the City and SEPTA, we would urge you to give the planned closure another look.

Thank You.

COMMENTS

City of Philadelphia

Philadelphia City Planning Commission

1515 Market Street
17th Floor
Philadelphia, PA 19102Robert Weiss, Esq.
Chairman
Barbara J. Kaplan
Executive Director
David A. Goldberg
Deputy Director

November 15, 1995

Ms. Marie Rust, Field Director
Northeast Field Area
National Park Service
Customs House Building
2nd and Chestnut Streets
Philadelphia, PA 19106

RE: Draft General Management Plan Environmental Impact Statement for Independence National Historical Park, August 1995

Dear Ms. Rust:

The Philadelphia City Planning Commission is pleased to submit its comments on the draft General Management Plan, including the draft Interpretive Media Plan, for Independence National Historical Park.

There are many aspects of Preferred Alternative "B" with which the Planning Commission is in full accord. First and foremost, we strongly support the Park Service's commitment to reinforce Independence Park's identity as the centerpiece of a larger historic district. Breathing down the walls that figuratively and literally segregate the Park from the surrounding urban fabric and the greater historic story is critically important if the Park Service is to renew its mission to interpret revolutionary and constitutional events in full context.

A more coherent Old Philadelphia District is also a primary goal of the Declaration Philadelphia tourism strategy, and in this regard, we will make every effort in the coming years to work with the Park Service to establish and/or strengthen physical and programmatic links between Independence National Historical Park and the City. We applaud the author's first step recommendations to better integrate the park with the district and the city through such actions as improved Welcome Park, and the proposal to involve the Franklin Institute in developing programs at Franklin Court.

We are also in support of the Park Service's recommendation to develop new facilities/activities within the INHP, in particular on Independence Mall. The inclusion of a new regional gateway visitor center, the National Constitution Center, a new Constitution Memorial Plaza, the Independence Institute, the Architectural Collection Museum, the First Bank Exhibit, and a new display in Independence Hall for the Declaration of Independence and Constitution documents, will significantly contribute to the visitor experience and the educational opportunity offered by INHP.

The National Park Service, working within a very compressed planning schedule, has developed a substantial program of recommendations that, if achieved, would enhance INHP's designation as a World Heritage Site, as well as sustain its position as America's premier historical park.

RESPONSES

01/26/96 14:16 2213 597 0815

NPS-BAKU

0002



United States Department of the Interior

National Park Service
Northeast Field Area
U.S. Customs House
200 Chestnut Street
Philadelphia, PA 1910615 000 Y 0000 70
01/26/96

January 23, 1996

Ms. Barbara J. Kaplan
Executive Director
Philadelphia City Planning Commission
17th Floor, 1515 Market Street
Philadelphia, Pennsylvania 19106

Dear Ms. Kaplan:

Thank you for your letter summarizing your response to the General Management Plan (GMP) for Independence National Historical Park. I am highly pleased that the National Park Service and the City of Philadelphia are substantially in agreement on the major points of the plan. I respond to some of your key concerns below.

As you know, we hope to initiate a process in which detailed design of Independence Mall will be undertaken. That process will incorporate an examination of the urban design issues you and many other correspondents have noted, and public participation will be encouraged. Your letter, as well as all the letters and statements we have received during the planning process, will be passed on to the design team, which has not been formulated yet.

A number of people have expressed concern over the location of a maintenance and storage building on the third block of the mall. The preferred alternative does not advocate a stand-alone building, but instead notes the need for this function. The extensive amount of new development proposed in the preferred alternative could not be adequately served from existing storage and maintenance facilities. It would be short-sighted on our part to fail to provide for making the most efficient use of available staff and materials by neglecting this obvious need. Please be reassured, however, that no structure for storage and maintenance would be seen by users of the mall or people driving by on adjacent streets.

We believe that a five-acre block with a number of proposed functions and structures easily can accommodate this necessary function in an aesthetically acceptable manner. We are quite cognizant of the importance of the gateway function of the

RESPONSES

COMMENTS

Page 2

However, in reviewing the draft document at a detailed level, we have identified a number of issues which pose concerns, including: the lack of an urban design structure or defining design guidelines for the redesign of Independence Mall; the scope of the impact analysis for the closure of Chestnut Street, and the appropriateness of certain recommendations in the draft Interpretive Plan. Our comments are as follows.

Urban Design Considerations for Independence Mall

While we understand that the General Management Plan is just that, a *general* plan, we believe that the major plan elements for the redesign of Independence Mall must be committed in a rigorous manner against the highest urban design standard. Issues relating to image, activities and circulation which should be considered in the next phase of the planning process include: creating a sense of entry and Park identity at key locations on the Mall; integrating a multiplicity of uses in the critical middle block; and, balancing the needs of the pedestrian for a safe and attractive environment with the requirements of cars and buses for efficient, convenient access to and within the district.

Creating a Sense of Entry and Identity for the Park

With the proposal to relocate the visitor center to the middle block of the Mall, and with the continued development of the Market Street visitor corridor from the Convention Center through to Historic East Market Street, the two primary gateways to Independence Park will clearly become the 6th and Race Streets vehicular entrance and the 50th and Market Streets pedestrian entry. Currently, neither of these gateways provide any acknowledgment that you are entering a national park.

6th and Race Streets Gateway

The north block has significant symbolic value in that it serves as the major entrance to NPS and the larger historic district for cars and buses traveling on both I-95 and I-76. As such, it requires a gesture of some prominence to signal entry and to convey Park identity to the visitor. While we are not necessarily advocating the "Big Flag" proposal (we find this proposal increasing and would recommend that it not be precluded from the plan), we do believe a project of a certain scope and visibility is required in order to create a strong Park image.

While this could be achieved through the construction of a landmark building, the one attraction proposed for the north block (the Constitution Center) is more likely to be located along Arch Street. Other "treatments" might include signage, sculpture, monuments or special dramatic landscaping.

One idea that doesn't work is locating the maintenance building on the north block. This is not an appropriate use for the mall's entrance. While we respect the ability of the Park Service to design a nice-looking building, even a small attractive building would be a noticeable distraction in the pleasant landscape that is the north block. In particular, a maintenance facility would be accompanied by vehicle parking, access and entry—service uses which are inappropriate to the image of the entrance to this nation's most significant historical park.

If the National Constitution Center is constructed on the 3rd block, it may be possible to incorporate a maintenance facility into it. Otherwise, we feel that the proposed use is incompatible with the goal to improve the image of the entrance to the park. The City will be happy to work with NPS to identify more appropriate sites for a maintenance facility.

01/26/88 14:17 2210 28/ 0515 NPS-BANU

2

block and its significance as part of the national historical park. The precise design treatment, location, size, and configuration for this function will be determined in upcoming design studies, and shared with the public at that time.

We agree that additional study is needed of the proposal to close the 500 block of Chestnut Street, and we appreciate the assistance that you and members of other City departments have provided in accomplishing this. At this writing, we have requested our traffic consultant to undertake additional analysis of mitigation alternatives and their impacts. The results will be provided to you and incorporated in the Final General Management Plan and Environmental Impact Statement.

I want to thank you and your staff both for the tough questions and also for the excellent support you have provided throughout the planning process for the Park. I look forward to continuing our working partnership as we turn toward further developing and implementing the plan.

Sincerely,

Maria R
Maria Rust
Field Director

cc: Martha B. Aikens, Superintendent, INDE

COMMENTS

RESPONSES

Page 3

Market Street Pedestrian Entry
The rest of Alternative "E" indicates that the first block will remain essentially as it is. We believe that there is a great opportunity to redesign this critical block in such a way as to improve views of Independence Hall, to create a more fitting front yard for Independence Hall, and to remove the walls which edge the Mall and isolate it from neighboring institutions and attractions.

While we agree with the recommendation in Alternative "E" that the current Liberty Bell pavilion be replaced and relocated to the middle of the first block, it is not clear as to what functions the new pavilion would perform. It would be our recommendation that we follow the suggestion made by Park Service consultant Vernon D. Dause that the new Bell Pavilion be limited to the simple display of the Bell. Interpretation of the story of the Bell should be presented in the new visitor center. This would allow for the design of a smaller and less obtrusive Bell Pavilion at the same time that it would permit a more intimate and rewarding experience for the visitor.

The landscaping, restroom structures and the brick walls surrounding the first block obstruct views of the Hall. Though we are sensitive to NPS budgetary constraints, we would like the OMP to be reflective of the long-term goal to create the most attractive setting possible for the cradle of world democracy. The block should be opened up to enhance views of Independence Hall and the surrounding urban scene, as well as to provide visitors with a more understandable orientation to and a stronger image of the Park. A new landscaping scheme, closer in spirit to that on Rittenhouse Square (incorporating low wrought iron fencing and landscaping in place of the existing high brick walls) should be included in Alternative "E" for both the first and second blocks of the Mall.

We are concerned that Alternative "E" proposes that the Market Street restrooms remain. We believe that these are visitor service functions that do not belong in the front yard of Independence Hall. They should be removed so that the 5th and Market corners are opened up to provide a full view of Independence Hall. The restrooms should be provided in the new visitor center should be more than adequate in number and location to properly serve visitors. If additional restrooms are needed, we would be happy to work with the Park Service to identify alternative locations for these facilities.

Integrating a Multiplicity of New Uses

An important question left unanswered in the current text for Alternative "E" is how to best integrate the proposed new activities for the Mall, particularly in the critical middle block. As recommended in Alternative "E", the second and third blocks of the Mall are to contain a number of new uses, including: the visitor center and supporting vehicular loading/unloading zone, the National Constitution Center with conference rooms, the Independence Institute, a Constitution Plaza, a picnic area, a festival events square, and a revamped Free Quaker Meeting House focused on the interpretation of the theme of religious tolerance. This mix of proposed uses is complicated and will require a high level of flexibility in the design process if we are to achieve an enlightened, attractive, comprehensible, safe and convenient environment for visitors.

It has been our view for some time that the middle block presents an essentially clean slate for redevelopment, and because of its size and location, represents the best opportunity to create a critical mass of new amenities and attractions for Independence Park and the Old Philadelphia Historic District. In order to make the most of this opportunity, the Planning Commission believes that the Park Service should continue to work with the City and other interested parties in developing an underlying urban design framework to guide the ultimate placement and design of new facilities on the Mall. Principles/elements of such a framework should include but not be limited to:

RESPONSES

COMMENTS

Page 3

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We are concerned that Alternative "E" proposes that the Market Street restrooms remain. We believe that the existing restrooms are not adequate for the number of visitors that will be using the new visitor service functions that do not belong in the front yard of Independence Hall. They should be removed so that the 4th/6th and Market corners are opened up to provide a full view of Independence Hall. The restrooms to be provided in the new visitor center should be more than adequate in number and location to properly serve visitors. If additional restrooms are needed, we would be happy to work with the Park Service to identify alternative locations for these facilities.

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It has been our view for some time that the middle block presents an essentially clean slate for redevelopment, and because of its size and location, represents the best opportunity to create a critical mass of new amenities and structures for the Mall. The Planning Commission believes that the District, in order to make the most of this opportunity, the Planning Commission believes that the Park Service should continue to work with the City and other interested parties in developing an underlying urban design framework to guide the ultimate placement and design of new facilities on the Mall. Principals/elements of such a framework should include but not be limited to:

COMMENTS

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Page 5

Creating a Friendly Pedestrian Environment

Vehicular access and pedestrian activity on the mall must be better coordinated. Pedestrian pathways along 5th and 6th Streets could be improved by extending the Mall outward by one lane, replicating the line of parking. Widened sidewalks along 5th and 6th Streets should incorporate enhanced landscaping and attractive street furniture to create a friendly and appealing pathway. Neckouts should be created at the major pedestrian intersections to shorten pedestrian crossings.

The security and safety problems in the underground garage are well known. Connections via escalators/elevators directly into the lobby of the visitor center would improve visitor orientation and safety concerns.

Impact Analysis

The closing of Chestnut Street between 5th and 6th Streets is an issue that needs to be studied further. The impact analysis must address the costs and benefits of this action. Investigation of the impacts resulting from the closure of Chestnut Street should have a threefold focus: (1) on pedestrian and vehicular circulation within the affected study area; (2) on SEPTA operations, tour and school buses, trolleys and horse carriages; (3) on access to businesses in the immediate area of the closure; and (4) on the adjacent Society Hill residential neighborhood. The suggested study area is 2nd to 8th, Pine to Race Streets. The investigation should build on the earlier, although limited, efforts of the Orth-Rodgers & Associates, Inc. traffic analysis. Recommendations for mitigation of identified impacts should be identified, and costs and benefits quantified, where possible.

Interpretive Plan

At the *First Bank* the plan calls for an exhibit on the financial foundations of the new republic, but limits interpretation to banking events and stories related to the First and Second Bank only. We would encourage here a broader program which looks at the American Banking Story, perhaps with the participation of the banking community. Linkages to related park and district buildings (the Merchant Exchange, Federal Reserve, the Bourse, the surviving 19th century bank buildings on Chestnut and Walnut Streets, the Mint) should be developed, bringing the story into the present.

At the *Second Bank*, interpretation for the portrait gallery currently encompasses the Capital City theme. The draft plan appears to place the interpretive focus on the Founders of the Nation, and doesn't address the Capital City theme. This resource of portraits presents a wonderful opportunity to present the Capital City theme and the qualities that attracted the nation's founders. Also, there is no discussion on the significance of this unusual resource, or the origin of the collection.

At the *existing visitor center* the plan notes that the building is proposed to house and display portions of the park's architectural study collection. The plan does not address the interpretive aspects of the collection. The collection is rich enough to support interpretive programs featuring Philadelphia architecture, historic building crafts and preservation technology. Programs might show the techniques of historic building construction, changes in preservation technology, tools and their use, stylistic changes over time, the use of pattern books, and the phenomena of the architect-carpenter and the gentleman architect.

In the context of the proposed regional visitor center, the plan proposes the updating of the Human film. We encourage the park to develop a new film resource that would introduce visitors to the

COMMENTS

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Page 6

buildings in the park and assist them in becoming oriented to their surroundings. The Huston film is dramatic and moving, but does not relate to specific sites the visitor will be seeing, and does little to encourage exploration of the Independence Park and its surrounding historic and cultural resources.

The architectural distinctiveness of the Merchants' Exchange interests many visitors. We would encourage the Park Service to open a portion of it to the public in the form of a library and/or reading room or even a coffee bar. Historically, the Exchange had a library and provided many other services for those involved in commerce. Consideration should be given to opening up access to the east portico to let the public view the waterfront area, as exchange users did a century and a half ago. The fact that the interior has been reworked would permit flexibility in creating public spaces as renovation plans for the building are developed.

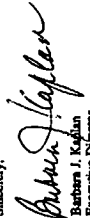
The Free Quaker Meeting House could be used as a location for exhibits on the story of religious liberty in 18th century Philadelphia. From its early years, the City had been shaped by the practices of religious liberty; it was one of the principles William Penn advocated in his plan for Philadelphia and one that influenced the thinking of the new nation's political leaders. (The building also tells a story of the limits of tolerance, as the Free Quakers were expelled from the main body of Quakers for participation in the Revolution.)

We would like to recommend that interpretation of the Independence Hall complex include a storyline about historical religious buildings placed as the location of the city and nation's government. The building is one of the oldest and most significant of the nation's early government buildings. A story which will help the visitor understand the Philadelphia context. On a related subject, the plan suggests a change in the signage of "Old City Hall" by adding "The Supreme Court" to the sign, or replacing the sign and identifying the building only as "The Supreme Court". We would like to see the designation "Old City Hall" retained.

While we wholeheartedly endorse the proposal to rework the underground museum as Franklin Court, we do have a concern about the plan's recommendation to remove the printing press from the Market Street Houses and place it in the underground museum. The operation of the press is the kind of animated activity that interests people and draws visitors in—they can see the press being operated through the window or open door, and make a casual decision to stop in.

In summary, the planning process for the GMP has put on the table a series of issues that present a challenge to the Park Service—and to the City. The challenge comes as the traditional operations of the Park Service are being scrutinized and transformed. It is a time when the Park Service must reach out to new partners to accomplish its mission. I do not think we can back away from the challenges that now face us, and I am convinced that by working together, we can craft an innovative and exciting future.

Sincerely,



Barbara J. Kaplan
Executive Director

cc: Mayor Edward G. Rendell

COMMENTS

Head House Square • Philadelphia, PA 19147
Telephone: 215-922-9307 • FAX: 215-922-8232



Superintendent to Independence Park,
Philadelphia

9th September 1995

Dear Madam

DATE REC'D: 9/12/95		BY: [Signature]	
SUPT	✓	MAINT	
ASST		PAO	20/75
ADM		R & VP	
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cc: A. Harwood, NEFO

I have received your wonderful brochures setting out some plans for Independence National Park and the surrounding areas.

Before anything in the way of change is decided I would suggest someone talks to the major tour operators both here in the United States and in Europe as well as Japan to get some idea as to what they and their customers would like to see.

From the European point of view Philadelphia does not rate very high as a destination point, and if you are about to commence on a huge project of this nature some consensus of opinion should be sort from the people this work is presumable aiming to benefit and please.

Yours sincerely

Michael A Harwood
Michael A Harwood
Managing Director
Dickens Inn.

Directors: Michael A Harwood • Patricia M Harwood • Braden Kinzile • Corrie Charles Dickens • Jane Marie Hill

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
315-313 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

January 22, 1996

Mr. Michael A. Harwood
Managing Director
Dickens Inn
Head House Square
Philadelphia, Pennsylvania 19147

Dear Mr. Harwood:

Thank you for your letter regarding the General Management Plan (GMP) for Independence National Historical Park. Your idea to speak with major tour operators is an excellent one. My staff does have frequent contact with tour operators and we receive a great deal of input from them.

I have taken the liberty of sharing your letter with Karen Butler, of Historic Philadelphia, Inc., who is developing a heritage tourism plan for the city. In addition, if there are specific ideas you would like to share with us, I ask that you contact Deirdre Gibson, National Park Service, Northeast Field Area Office in Philadelphia at 215-597-1841. As the primary GMP planner, she will be most interested in any suggestions you might have.

Sincerely,

Martha B. Alkens
Martha B. Alkens
Superintendent

COMMENTS

THE KEVIN F. DONOHUE COMPANY, INC.

HENRY B. GLOVER, JR., CSM
VICE PRESIDENT
PROPERTY MANAGEMENT

November 6, 1995

National Park Service
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

Dear Ms. Aikens:

I am writing to voice my concern regarding the proposal to permanently close traffic on Chestnut Street between Fifth & Sixth Streets.

While closing Chestnut Street might create a more tourist friendly environment for Independence Park visitors, it would conversely become quite problematic for residents and people who work in the neighborhood.

By permanently closing Chestnut Street, Fifth and Sixth Street traffic would have to be rerouted to neighboring streets which would ultimately lead to congestion. Fourth and Seventh Streets, which would presumably become alternative routes for both car and bus traffic, would be greatly affected by the extra traffic load.

Seventh Street, which already has heavy traffic due to the fact that it leads directly into Interstate 95 and Route 676, is also a tourist route for horse and carriage travel which slows traffic considerably. This coupled with the fact that the Route 47 Bus runs on this street would make adding extra traffic almost disastrous.

The permanent closure of this section of Chestnut Street would also effect entry to Sanson Street which runs one way east to west on the Northern side of the Curtis Center. It is this street that all of our tenants and their clients use to get to the Curtis Parking Garage which is located beneath the building. With Sixth and Chestnut Street not available to traffic, entry to the parking garage would become virtually impossible since entry to this street would no longer be accessible through Sixth Street which runs south. This would also effect entry to our loading dock as well as those belonging to The Public Ledger Building and The Census Bureau. Sanson Street would either have to be redirected so that it could be accessed through Seventh Street or converted into a two way street to provide entry.

THE CURTIS CENTER, SUITE 700, INDEPENDENCE SQUARE WEST, PHILADELPHIA, PA 19106 • (215) 238-6400 • FAX: (215) 238-6420

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY REFER TO:

D18 (INDE)

January 22, 1996

Mr. Henry B. Glover
Vice President of Property Management
The Kevin F. Donohue Company
Suite 700, the Curtis Center
Philadelphia, Pennsylvania 19106

Dear Mr. Glover:

Thank you for your letter regarding the General Management Plan for Independence National Historical Park. I appreciate your concern over the potential impact to the Curtis Center of the proposed closing of the 500 block of Chestnut Street.

We are working with the City of Philadelphia to further study the impacts of this proposal and possible solutions. As you may realize, a final decision on the proposed street closure is the responsibility of the city, and not the National Park Service. While my first responsibility is the safety of visitors and the protection of the park's fragile historic resources, the park will continue to be a good neighbor.

We have looked again at the potential impact to Sanson Street and your building. Because Sixth Street and the 600 block of Chestnut Street would not, in fact, be closed, we believe that your situation would be unchanged from its present conditions.

I am grateful for your ongoing support and interest in the park and will work with you to resolve any concerns regarding overall impacts to the neighborhood.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

RESPONSES

COMMENTS

Page 2

While we here at the Curtis Center fully support your efforts to serve Visitors and preserve the historic community, as neighbors we do not feel that this action would be beneficial to all members of the community.

Sincerely,

Henry B. Glover
Vice President of Property Management
/tnb

COMMENTS



October 31, 1995

Ms. Martha Aikens
Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

Dear Superintendent Aikens:

As President of the Greater Philadelphia Hotel Association, I presented our concerns regarding the General Management Plans of Independence National Historical Park at the public hearing on October 5, and I appreciated the opportunity and time allotted for my remarks.

There are still two important issues with which our membership is primarily concerned:

1. If what I read and hear is correct, there is the possibility that a master planner will be hired in July. We believe that a master planner and a dynamic master plan are necessary for the success of the development of Independence Hall, but we also firmly believe that the process must begin immediately. The focus must be to accelerate the process and complete this project by the millennium. If the National Park Service is willing to be flexible and encourage the Pew Charitable Trusts to proceed with its designs promptly, it certainly makes sense to ensure that the overall master plan also commence at once. It is only appropriate that the new Visitors Center not be treated as an isolated island but rather as a great and vital public space.
2. I am concerned about a remark you made at the public hearings. In response to a question, you said the Park Service is not in the tourism business - that tourism is the job of the City. I think that you, as Superintendent of INHP, and the Park Service are missing an important point. The Park Service is responsible for the development and the future of 15 important acres in the middle of a city that serves as caretaker for two of America's most renowned icons and that expects travel and tourism to be its number one industry by the year 2000. Therefore, the Park Service is most definitely in the tourism business! Ben Franklin said it best on July 4, 1776, "We must all hang together or assuredly we shall all hang separately." The master planner mentioned above must be an expert in attraction

Suite 300
One Penn Center
at Suburban Studios
1617 John F. Kennedy Blvd.
Philadelphia, PA 19103
215-557-1900
Fax: 215-557-9750

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY REFER TO:

D18 (LEDB)

December 11, 1995

Mr. Jim Beley
President
Greater Philadelphia Hotel Association
Suite 300, One Penn Center
1617 JFK Boulevard
Philadelphia, Pennsylvania 19103

Dear Mr. Beley:

Thank you for your letter regarding the General Management Plan (GMP) for Independence National Historical Park and for your statement at the October 5 public meeting. I would like to add clarification to the two points that you have made.

1. The Pew Charitable Trusts soon will announce the hiring of a highly regarded design team to develop a detailed master plan for Independence Hall and conceptual plans for a regional visitor orientation center to be located on the mall. This initial exploratory work, based on the GMP preferred alternative, will proceed immediately, and is timed to be completed next summer, at about the time when the Record of Decision - the final step in completing the GMP - is filed. At that time, the Trusts may decide to donate additional design work and construction funding for the center.

The National Park Service and the Trusts share with the community the sense that the mall can be a remarkable public space that works for visitors and residents.

2. I feel that you may have interpreted too narrowly my remark that the National Park Service is not in the tourism business. It is quite true that we are not: our Congressionally mandated mission is preservation and interpretation. Put in modern terms, this means caring for the resources with which we are entrusted while providing the best possible experience for our visitors. And we must be doing something right or we wouldn't be the most visited site in the region!

An important focus of the GMP, however, has been a very public examination of the park's responsibility to the community. The result has been that a third role for the park, beyond preservation

COMMENTS

design who understands what draws visitors to our great city to take part in the extraordinary tourist experience that our history assures.

I urge you to consider the needs of the entire region as you proceed with these plans. You have the once-in-a-lifetime opportunity to bring a positive change to our Philadelphia landscape, its economy and especially the future of its hospitality industry of which I am proud to be a part.

Sincerely,


Jim Beley
President
General Manager, Ritz-Carlton, Philadelphia

Enclosure

cc: Enclosed list

RESPONSES

2

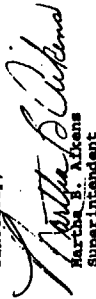
and interpretation, has been defined: the park will become an active partner in the life of the community. Certainly, sharing in the development of heritage tourism is one obvious place for us to participate. We continue to work with private organizations and with the city and commonwealth to provide quality and appropriate experiences and facilities within the park that meet the high expectations visitors have for national parks. We also will enhance existing partnerships and develop new ones that assist neighboring historic and cultural sites in sharing in the wealth of visitation.

Yet we do not have the authority or resources to take actions beyond our boundaries. This is the point at which the development of heritage tourism becomes the responsibility of others. I encourage your organization and others who may be interested to achieve the necessary tourism ingredients that a number of studies show to be missing: advance promotion of the city's many cultural and entertainment resources; substantial financial support for existing cultural resources; active and uncompromising preservation of the historic buildings and special qualities that are the essence of the historic district; clean, well lit, safe and welcoming streets; affordable parking, dining and lodging; and capital investment that results in an active and vibrant neighborhood. It is a bit optimistic to imagine that a redeveloped Independence Mall can overcome the absence of these well known components of successful heritage tourism.

We will do the best job that we can, and we hope that the community recognizes that there are corresponding responsibilities that must be carried out if goals for heritage tourism are to be met. If not, I must question whether the community is serious about being in the tourism business.

I would be happy to discuss these issues with you and members of your organization. I also hope that you will do me the favor of distributing this response to the people who received your letter.

Sincerely,


Martha S. Atkins
Superintendent

RESPONSES

COMMENTS

Mr. David L. Cohen, Esq. Chief of Staff City of Philadelphia City Hall, Room 204 Philadelphia, PA 19107	Honorable Edward Rendell Mayor City of Philadelphia City Hall, Room 216 Philadelphia, PA 19107	Honorable Thomas Hagen Secretary of Commerce Commonwealth of Pennsylvania Harrisburg, PA 17120
Honorable Eugene Elcock Secretary of Education Commonwealth of Pennsylvania 333 Market St., Harrisburg Bldg. 2 Harrisburg, PA 17120	Honorable Tom Blago Governor Commonwealth of Pennsylvania 228 Main Capitol Building Harrisburg, PA 17120	Mr. Karen Butler Mayor's Action Council for Visitor City Hall, Room 143 Philadelphia, PA 19107
Mr. Roger Kennedy Director National Park Service 1849 C Street NW Washington, D.C. 20240	Mr. Mark Rust Regional Field Director National Park Service Custom House Philadelphia, PA 19106	Honorable Dwight Evans House of Representatives 7189 Ogontz Avenue Philadelphia, PA 19138
Honorable Joseph Pitts House of Representatives Room 246, Main Capitol Bldg. Harrisburg, PA 17120	Honorable Matthew Ryan House of Representatives 216 N. Jackson Street Media, PA 19063	Honorable Vincent Fumo Pennsylvania Senate 401 Main Capitol Building Harrisburg, PA 17120
Honorable Richard Tighman Pennsylvania Senate 281 Main Capitol Building Harrisburg, PA 17120	Honorable Robert Borzdi US House of Representatives 2183 Rayburn House Office Bldg. Washington, D.C. 20515	Honorable Charles Fetish US House of Representatives 1206 Longworth House Office Bld Washington, D.C. 20515
Honorable Thomas Foglietta US House of Representatives 241 Cannon House Office Bldg. Washington, D.C. 20515	Honorable Rick Santorum United States Senate 120 Senate Russell Office Bldg. Washington, D.C. 20510	Honorable Arlen Specter United States Senate 530 Senate Hart Office Bldg. Washington, D.C. 20510

COMMENTS

Kise Franks & Straw

Architects and Planners
James M. Kise, AIA
Philip E. Franks, AIA
James E. Straw, AIA

■ 20 November 1995

Ms. Marsha Aikens, Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106RE: Draft General Management Plan
Environmental Impact Statement
Independence National Historical Park

Dear Ms. Aikens:

I testified orally on the second day of public comment and wish to restate and add somewhat to those comments.

1. The primary interpretive theme as stated in the Draft Plan should set a context for the key events of independence. What happened in Philadelphia was a culmination of many events and actions, and not a spontaneous combustion of ideas. The latter could be wrongly inferred by visitors if given too narrow a focus on 1774-1800.
2. In treating Philadelphia within the primary interpretive themes, little is said about William Penn and his significance to why Philadelphia became the premier 18th century city in spite of a late date of founding. Why Pennsylvania became an economic powerhouse, and how his radical notions influenced the time. Freedom of religion, trial by jury, representative government, and an open door settlement policy were unique characteristics that set Penn's colony apart from others. People today, for example, are astonished to learn that Massachusetts had a state church supported by taxes into the early 19th century, and that Virginians once were penalized if frequently absent from Church of England services. Franklin, Jefferson, and their colleagues stood on the shoulders of Penn's ideas.
3. Related to my previous point, the Liberty Bell's origin is not stated in the Draft Plan nor is it conspicuous in the park's literature. It is highly significant that Pennsylvanians ordered the bell in commemoration of the 50th anniversary of Penn's Charter of Liberties, from which the bell's other associations derive based upon the inscription.
4. It is essential to translate the General Management Plan into a specific urban design plan of the highest quality, using building space programs that enable key buildings to be properly sized and located. Having gotten the Mall and its pieces

James M. Kise
Philip E. Franks
James E. Straw
Kise Franks & Straw Inc.
219 North Broad St., 9th Fl.
Philadelphia, PA 19107
(215) 561-1000

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311 S. 19th Street
Philadelphia, PA 19106

IN REPLY, REFER TO:

D18 (INDE)

January 22, 1996

Mr. James Nelson Kise
Kise Franks & Straw, Inc.
9th Floor, 219 North Broad Street
Philadelphia, Pennsylvania 19107

Dear Mr. Kise:

Thank you for your letter and for your statement at our public meeting on the General Management Plan (GMP) for Independence National Historical Park. I would like to provide a response to several of the points contained in your letter.

The park's interpretive themes are based on its enabling legislation, and while William Penn and his exceptional influence are unquestionably significant, it is not within our power to make this a primary theme for the park. We continue to hope that other institutions might take on this special interpretive need, and would be delighted to cooperate as we are able. The proposed visitor center will provide some contextual interpretation to set the stage for visitors, although again, such context will provide an introduction rather than function as a primary theme.

The material on the Liberty Bell found in the draft GMP is intended to provide readers with a broad overview of park resources and give a general understanding of the environment affected. A number of more detailed documents on the Liberty Bell and its role in American history are available in the park.

We strongly agree with you that a number of questions on urban design issues remain to be answered for Independence Mall. This spring, we hope that a conceptual design process for the mall and the visitor center will be initiated. It will be open to the public's participation, and I encourage you and other members of the design community to assist in this important effort.

The National Park Service's (NPS) recognition of the importance of the proposed National Constitution Center (NCC) is reflected in its inclusion in our preferred alternative. Congress designated the

COMMENTS

Ms. Marsha Aitens
November 20, 1995
Page 2.

wrong the first time, we cannot afford to make a mistake again. The offer to fund a regional visitor center by the Pew Charitable Trusts gives urgency to the urban design plan since such a building cannot succeed without a context of program and design relationships.

5. Alternative E - The Preferred Alternative raises several specific concerns:

- a. The Liberty Bell Pavilion, if "enlarged to accommodate interpretive needs, or a new pavilion ... built", poses a particular problem of the size of the pavilion relative to Independence Hall. The present pavilion is an unsympathetic looking visual obstacle to the Hall seen from Market Street. I hope it will be replaced. An elegant, Bauhaus-like pavilion closer to the Hall could be visually successful, much as suggested by Paul Cret's design, but probably too small to work well. Bigger may work better, but is unlikely to look better.
- b. The Constitution Memorial as proposed for the Judge Lewis Quadrangle is a highly appropriate symbol opposite Independence Hall. It may offer the opportunity to create the visual "stop" to the overwhelmingly long axis of the Mall which does more to call attention to the Penn Mutual Life Insurance Company than to Independence Hall. This is especially true relative to the regional visitor center, which, while functionally and locationally vital, does not possess the symbolic content for becoming a piece of architecture that punctuates or truncates the Mall. I do not share the concerns of those who insist that the visitor center be in the third block, especially since Market Street will be an increasing arrival point for those coming from the Convention Center.
- c. The National Constitution Center, by the nature of its stated purpose, is a destination of enormous potential meaning and visitation. I do not see this spelled out in the alternative, and fear that its sponsorship by another entity may hinder its proper plan and program concepts from being integrated into the whole. A major coordinating effort is needed so that this last block does not become a "back door" to the city instead of the "front door" we all want.

Sincerely,

James Nelson Kise
James Nelson Kise, AIA/AICP

JNK/jm:38

RESPONSES

2

NCC organization as the entity responsible for its development. Yet charged the NPS with the responsibility for oversight in conceptual and facility development. We intend to work closely with the NCC to achieve the finest and most appropriate result.

Sincerely,

Martha S. Aitens
Martha S. Aitens
Superintendent

NOV 27 '95 11:59AM WRT, PHILADELPHIA

WALLACE ROBERTS & TODD
P. 114

Environmental Planning
Urban Design
Landscape Architecture
Architecture

VIA FAX
215) 597-1003

November 20, 1995

**Ms. Martha B. Albans
Superintendent
National Parks Service
3311-313 Walnut Street
Philadelphia, PA 19106**

Re: Independence National Historic Park

Dear Mr. Albert:

believe that the Draft General Management Plan and Environmental Impact Statement is an excellent framework for further planning and design for the future of Independence National Historic Park. It is the hope of the National Trust for Historic Preservation that the National Park Service will continue to work for a comprehensive documentation of existing conditions and evaluation of options for the future that will serve the public well as new programs and designs are proposed.

It is essential that this phase of work be supplemented with an equally comprehensive presentation of urban design, architectural and landscape architectural principles. This work will focus upon obtaining the best aesthetic and functional arrangement of indoor and outdoor uses to create a dynamic and beautiful place for every visitor's experience. Obviously this work will build upon the Draft Management Plan and, for some respects, may arrive at different needs or design intent.

You have acknowledged an iterative, dynamic process for creating the final plan and design in your public participation process. In this regard, I suggest that you consider 6th Street as the main access street for circulation of activating vehicles. The longer frontage of 6th Street and immediate access to the garage can facilitate the easier accommodation of both buses and automobiles from Arch Street. If Arch Street were utilized for these functions, it would create a major barrier between the second and third blocks, thereby obliterating any sense of unity of the 3 block Mall.

Respectfully,

Bill Roberts
WILLIAM H. ROBERTS, PASLA

2710B:pf

260 South Broad Street
Philadelphia, PA 19102-5075
215 732 5215
215 732 7591 fax

Cornel Gables, FL
San Francisco, CA
San Diego, CA



IN JIMMY CARTER TO

United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

018 (INDZ)

January 22, 1996


Mr. William H. Roberts
Wallace Roberts & Todd
260 South Broad Street
Philadelphia, Pennsylvania 19102-5075

Dear Mr. Roberts:

Thank you for your letter and for your appearance at our public meeting on the Draft General Management Plan (GMP) for Independence National Historical Park. I am grateful for your words of encouragement.

As you know, a CWP is a necessary and appropriate precursor to the design process. We hope that a process to consider conceptual design for Independence Mall and the proposed visitor center will be initiated in the new year. I appreciate your analysis of the conditions represented by Sixth and Arch Streets, and will pass your letter on to the design team when it is formulated.

Sincerely,

Sincerely,

 Martha B. Aikens
 Superintendent

COMMENTS

12/12/95 09:22

0012

BLYNN HOSPITALITY ASSOCIATES
Hospitality Consulting • Acquisitions

December 4, 1995

Mr. Roger Kennedy
 Director
 National Park Service
 1849 C Street, N.W.
 Washington, D.C. 20204

Re: Independence National Historical Park in Philadelphia, PA: Potential Closure of Chestnut Street Between 5th & 6th Streets/ Proposed Location of Constitution Center.

Dear Mr. Kennedy:

I am opposed to the proposed closure of Chestnut Street between 5th and 6th Streets in Philadelphia because of the additional traffic congestion this will create on surrounding streets. Market Street, which would receive most of the diverted traffic, is already at or beyond capacity and should not be the recipient of more traffic.

As a Board Member of Historic East Market Street and active hospitality consultant in the area, I believe that this improvement will not enhance the visitor experience to Independence National Historical Park.

I would also like to register my support for the master plan which would place the Constitution Center in between Market and Arch Streets and the new Visitors Center in between Arch and Race Streets. This would make the Liberty Bell and our nation's Constitution the centerpiece of the mall which is and will be the primary reason people visit Philadelphia.

Thank you for your consideration.

Very truly yours,

L. Clarke Blynn
 L. Clarke Blynn
 Principal

cc: Ms. Martha Atkins

Plymouth Corporate Center, 625 Ridge Pike A-107, Conshohocken, PA 19428 • 610-828-1357 FAX: 610-828-1942

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
 Independence National Historical Park
 511-315 Walnut Street
 Philadelphia, PA 19106

BY FAX/REPLY TO:

D18 (INDE)

JANUARY 22, 1996

Mr. L. Clark Blynn
 Blynn Hospitality Associates
 Plymouth Corporate Center
 625 Ridge Pike A-107
 Conshohocken, Pennsylvania 19428

Dear Mr. Blynn:

Thank you for your letter regarding the General Management Plan (GMP) for Independence National Historical Park. Roger G. Kennedy, Director, National Park Service, has passed it to me to prepare a response.

I appreciate the concern of Historic East Market Street, Inc. regarding the potential impact to Market Street of the proposed closing of the 500 block of Chestnut Street. A traffic study completed for the GMP and performed by the organization, Orth-Rogers and Associates, Inc., identifies the level of service at 5th and Market Streets as "Level F." A follow up draft study of mitigation measures related to the proposed closing of Chestnut Street identifies means to improve that service to "Level C." A copy of this document will be forwarded to you when it is completed.

We are working with the City of Philadelphia to further study the impacts of closure and possible solutions to the impacts. A final decision on the proposed closing is the responsibility of the city, and not of the National Park Service.

I strongly believe closing the block of Chestnut Street that lies between Independence Hall and the Liberty Bell will greatly enhance the visitor's experience, enable safe crossing for thousands of visitors of all ages, and create a more dignified setting for the historic resources. In addition, elimination of the vibrations caused by heavy vehicles will reduce the threat to the structural stability of Independence Hall.

Our first responsibility is the safety of visitors and the protection of the park's fragile historic resources.

COMMENTS

RESPONSES

2

I am grateful for Historic East Market Street, Inc.'s ongoing support and interest in the park and will work with you to resolve this concern.

Sincerely,



Martha B. Atkins
Superintendent
Independence National Historical
Park

COMMENTS

AIA Philadelphia

A Chapter of The American Institute of Architects



October 6, 1995

Martha B. Aikens
Superintendent
United States Department of the Interior
National Park Service
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA. 19106

Dear Ms. Aikens:

On behalf of the Philadelphia Chapter of the American Institute of Architects I have enclosed a copy of the testimony of Michael L. Prifti, AIA, Chapter President, which was presented at the October 5th hearing on the Draft Management Plan for Independence National Historical Park at the Visitors Center.

We thank you for the opportunity to review and comment upon the Plan and look forward to working closely with the Park Service as a Master Plan, with physical constructs, is developed. We stand ready to be part of any civic Advisory Committee we hope would be established to guide the next stages of planning, design and development for this important historic place.

Please contact me at 215-569-3186 if I can be of further assistance.

Sincerely,

Sandra L. Garz
Sandra L. Garz, AICP

Enclosure

117 South 17th Street
Philadelphia, Pennsylvania 19103
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Bookstore 215-569-3186
Facsimile 215-569-9226

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

January 22, 1996

Ms. Sandra L. Garz
Executive Director
AIA Philadelphia
117 South 17th Street
Philadelphia, Pennsylvania 19103

Dear Ms. Garz:

Thank you for forwarding Chapter President Michael Prifti's remarks regarding future design for Independence Mall. I appreciate the chapter's understanding and support of the preferred alternative, and also value the time that members of the chapter have contributed to its development and review.

As we have discussed, the National Park Service has considered the possibility of commercial development of the third block of the mall, including a hotel. Our system-wide policy constrains us from allocating parklands for hotels in areas where sufficient overnight accommodations already exist, or where there are nearby private lands on which facilities could be built. This certainly is the case at Independence. We share your concern over the need to activate the mall and welcome additional suggestions you might have.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

RESPONSES

COMMENTS

AIA Philadelphia

A Chapter of The American Institute of Architects

October 5, 1995

To: National Park Service

From: Michael L. Pritfi, AIA
President, AIA Philadelphia

Re: TESTIMONY: DRAFT MANAGEMENT PLAN FOR
INDEPENDENCE NATIONAL HISTORIC PARK

AIA Philadelphia is a professional membership organization representing over 1,000 registered architects and affiliated members in the four county region including Philadelphia, Montgomery, Delaware and Chester counties.

On behalf of AIA Philadelphia I thank you for the opportunity to testify on the Draft General Management Plan for Independence National Historic Park. As you are probably aware, the Philadelphia Chapter of the American Institute of Architects prepared a position paper concerning Independence Mall back in the Spring of this year to address the many issues raised by the redevelopment of such an important public and historic place. We identified many problems with the Mall as it currently configured -- its weakness: as a gateway to historic Philadelphia, as a setting for Independence Hall, as a natural crossroads between commercial Philadelphia on the west

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October 25, 1995 Testimony - INHP
Page 2

and historic Philadelphia on the east and to truly inspire those who visit commensurate with its stature as a historic place.

We are proud that early in the process AIA Philadelphia presented a new vision for Independence Mall including urban design and programmatic recommendations, which we shared with you. We also circulated these ideas to over 100 organizations in the public, civic and business community.

We are pleased to see that many of the ideas we put forth are now incorporated into the Preferred Alternative of the Draft General Management Plan including placement of the Constitution Center onto the Mall.

We still however, would like to stress the following points, as the Management Plan goes forth and a Master Plan with physical constructs is developed.

-There is a need to develop the northern block of the Mall to its full potential so that it truly becomes an important part of the City. This may require more intensive activity on the third block. The uses proposed in the INHP Preferred Plan include the Constitution Center, a picnic area, a special events space and a multi-purpose storage facility. We believe that greater consideration should be given to additional uses such as tourist lodging to reinforce the

COMMENTS

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October 25, 1995 Testimony - INHP
Page 3

notion that a visit to the Mall is not simply a day long activity but one worthy of an overnight stay. Similarly, the uses must generate high pedestrian traffic to create an intensity of use at this furthest block of the Mall.

-In addition, the importance of pedestrian access through the Mall must be reflected in any plan to redesign this space. In particular, the surrounding sidewalks on 5th and 6th Streets must be sensitively incorporated into the interior spaces of the Mall. Similarly, the continuity of the east-west streets must be maintained and connections from the interior of the Mall to adjacent buildings and uses must be maximized to facilitate pedestrian access.

Again, we thank you for incorporating extensive citizen input into the General Management Plan and stand ready to assist in the physical expression of this Plan.

COMMENTS

AIA Philadelphia

A Chapter of The American Institute of Architects

November 17, 1995

Martha B. Aitkens
Superintendent
United States Department of the Interior
National Park Service
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA. 19106

Dear Ms. Aitkens:

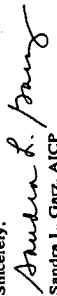
On behalf of the Philadelphia Chapter of the American Institute of Architects I am enclosing comments regarding the Draft General Management Plan EIS for Independence National Historical Park. AIA Philadelphia, through a special Task Force of Board and membership representatives, has been actively involved with this project for over a year. We have commented at public hearings and written Position Papers on the matter which have been widely distributed.

We now ask that our present comments, in the form of a Revised Position Paper on INHP, be incorporated as part of the "official record" under the NEPA process.

Please be advised that we are available for further consultation and assistance as the Park Service, the City, the Pew Charitable Trusts or other participants engage planning and design professionals on projects which will ultimately shape the form, function and design standard for the entire Mall.

Please contact me at 215-569-3186 when we can be of further assistance.

Sincerely,



Sandra L. Garz, AICP
Executive Director

Enclosure

cc: Marie Rust, NPS
David Hollenberg, NPS
Diedre Olson, NPS

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RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA. 19106

IN NPS'S FILES TO:

D18 (INDE)

January 22, 1996

Ms. Sandra L. Garz
Executive Director
AIA Philadelphia
117 South 17th Street
Philadelphia, Pennsylvania 19102-5035

Dear Ms. Garz:

Thank you for sending the Chapter's revised comments on the draft General Management Plan (GMP) for Independence National Historical Park. All of us greatly appreciate the AIA's continuing contributions to the planning process. Please let me respond to and clarify some of the points you have made.

Process. I appreciate your succinct description of the objectives of some of the partners. We have detailed this for the full range of partners on pages 31 through 36 of the GMP. In addition to the role you have noted for the National Park Service, our interests further include providing for a broad range of visitor use services (i.e. orientation, welcoming, safety measures, education, etc.) and preservation of the park resources unimpaired for future generations.

Programming and Design. Programming and design have not been on the "missing" list, but rather are ingredients appropriate to a conceptual design that will follow the GMP. As you know, we hope that that process will be initiated in the spring. It is important to note, however, that while the press gave a great deal of attention to Independence Mall, much of the concern we heard in our direct work with the public during the two-year planning process will be addressed by programmatic changes in the park's operations rather than just through physical changes on the mall. I must also make clear, as the GMP notes, that there are many partners in addition to those you have named, and that because the mall is and will remain a national park, the park's functional requirements are paramount.

Alternative B - The Basis for this Analysis. The foundation for the planning effort can be found in National Park Service policy as well as the Purpose and Significance statements found on page 3 of

COMMENTS

AIA Philadelphia

A Chapter of The American Institute of Architects

RESPONSE TO THE NATIONAL PARK SERVICE'S
DRAFT GENERAL MANAGEMENT PLAN

Introduction

The evolution of plans for Independence Mall has taken a uniquely American turn which parallels the situation in which the architects of the Constitution found themselves more than two hundred years ago. There are competing interests and deeply felt differences on what modifications to the Mall might be appropriate. The National Park Service's General Management Plan has been a lightning rod which has focused the energies of four important partners on this problem.

It is now up to these partners to form an effective working relationship, because just as in 1783, failure is not a viable option. We believe that the sustained involvement of architects experienced in programming and urban design is the necessary catalyst to a process by which designs that serve effectively the needs of all the partners may be developed.

Independence Mall is like few other national parks. It is not a natural environment. It is instead a built place where we come to understand and celebrate the creation of our way of life. It is historically and functionally linked to the living city in which it is located. Some of its most important artifacts are even owned by this city. As the cradle of liberty, it is the continuing focus of worldwide interest and respect for what was done here. Just as the park is unique, so too must its planning process. While the Park Service must follow the laws and regulations which apply, there is here also a larger cultural and ethical responsibility which can only be fulfilled through creative engagement in this unique situation in the largest possible terms.

These remarks review and develop further the ideas of the Philadelphia Chapter of the American Institute of Architects, which were first expressed in its position paper of June 7, 1995. We discuss both the overall process and the relationship between the partners and provide a detailed evaluation of the Preferred Alternative E of the park's proposed General Management Plan.

The making of a place

In our view, the design goal of all parties should be to make a world class place. A place is made when enjoyable and important activities occur in appropriate relationship to space over a long period of time. Rittenhouse Square is a place. The concourse of 30th Street Station is a place. The Art Museum steps are a place. Independence Mall is a space, but it is not yet a place.

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RESPONSES

2

the draft GMP, the description of Management Goals beginning on page 24, and the Introduction to the Alternatives beginning on page 43. The alternatives provided different means to achieve the same goals.

Evaluation of Alternative B, point 1. We recognize that there is such concern over the form that the proposed maintenance building might take. The park is recognized for the high quality of its maintenance, and with the intensive development proposed for Independence Mall, it would be irresponsible for us to fail to provide a facility that allows us to make the most efficient use of available staff and materials. I can assure you, however, that no stand-alone building for storage and maintenance will be seen by users of the mall or people driving by on adjacent streets. The precise design treatment, location, size, and configuration of this structure will be determined in upcoming design studies, and shared with the public at that time.

It is unfortunate that the term "picnic area" seems to convey a vision of scattered, hefty tables and leaning pine trees on a leftover pocket of land. There is no term for our image of an urban picnic area, yet I would submit that places such as Rittenhouse Square are just that. I invite you to join me on any fine spring day to see thousands of school children and workers crowd the park looking for but not finding enough good spots to eat lunch and enjoy the passing scene. This is a need that is obvious to us in three seasons of the year, and we look forward to providing a wonderful spot for it.

Because of the heavy volume of traffic on Fifth, Sixth, and Race Streets, and the fact that there are no pedestrian destinations north of Race Street, we see little hope that meaningful pedestrian connections will be made from Independence Mall northward. However, we would be interested in any proposals that the Fairmount Park Commission, the Port Authority, or others responsible might be willing to undertake on their own.

Evaluation of Alternative B, point 8. Limited commercial activities to serve visitors would occur on Independence Mall in connection with the new visitor center. They would be minimal because numerous private businesses adjacent to the park provide many opportunities and resources to meet visitors' needs and desires, and the park does not wish to provide unfair competition. We agree that the buildings surrounding the mall may offer opportunities for retail development, but studies or proposals for lands beyond the park are far beyond our authority or ability to undertake. Perhaps the AIA would be willing to work with the City

COMMENTS

Process - the partners and their diverse objectives

The planning process for Independence National Historical Park has unfolded to include a rich group of partners: The National Park Service, the City of Philadelphia, the National Constitution Center, and the Public. When a specific planning decision impacts upon a primary objective of one of the partners, the potential for conflict is high as is apparent right now. It is therefore appropriate to try to understand just how these objectives motivate the reactions of each partner. In our view the primary interests of the partners are as follows:

National Park Service: Maintenance of the fabric and authenticity of the historical artifacts and buildings, accurate interpretive presentation, appropriate historical symbolism.

City of Philadelphia: Rapid and effective enhancement of the identity of the City's premiere attraction, in concert with the City's investment in tourism development, integration of the Park and Mall with the surrounding districts, Old City, Society Hill, Washington Square West, Market East, and Franklin Square.

National Constitution Center: Obtaining a prominent site with a guaranteed and logical flow of visitors, evolution of the interpretive scheme of the Park to incorporate the NCC.

The Public: Opportunity to have a variety of enjoyable and stimulating cultural experiences in an authentic setting, accommodation of a variety of functional needs related to different constituencies: tourists, local residents, businesses, conventioners, special celebrations and events.

Programming and design - the missing ingredients

We are frankly impressed that so much has been accomplished without the involvement of programming, urban design, and architectural professionals as consultants to any of the parties. To a degree this absence has been addressed by the good faith efforts of all parties to convene workshops and other short term activities. Many of the conflicts that have now emerged can be resolved through the leadership that experienced design professionals provide in clarifying and meeting diverse and complex objectives through physical design.

While much of the discussion thus far has centered on the proper symbolic values which should be represented in Independence Mall, a great deal of public criticism has focused upon the failure of the Mall and the Park to meet a variety of functional requirements. The development of functional requirements is a specialized discipline in itself which would aid all parties in arriving at objective criteria for improving the many aspects of the Park which do not work well.

2

RESPONSES

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of Philadelphia and the General Services Administration to initiate this work.

Evaluation of Alternative II, point ii. By National Park Service Management Policy, a GMP is required to include "management zoning" for park lands that will fulfill management objectives and achieve the purpose of the park. This is the primary reason for what may seem on first glance to be a departure from the general level of detail of the GMP. In regard to the high security zone, a remarkable number of heads of state and other high government officials visit the park. It is feasible to design visually unobtrusive security measures in the southern end of the first block of Independence Mall, and is the reason why that location has been assigned the function of accommodating these exacting visits.

Evaluation of Alternative II, point 12. A series of transportation studies were undertaken as part of the planning process, and the results were used in the development of the draft GMP. In addition, we have worked with the city to identify mitigation measures for the effects of closure, as a result of public comments on the draft GMP. These will be delineated in the final GMP. The six alternatives identified various means to lessen or eliminate traffic and its effects in this important spot. We believe that closing the block is the only effective means to meet the objectives of public safety and resource protection, and so this will continue to be our proposal. As you know, however, this is a city street, and a decision to close the block would be the responsibility of the city.

Let me assure you that while the press has focused almost exclusively on Independence Mall, both the GMP process and also work in connection with the ongoing utilities rehabilitation program have carefully considered the entire park and all its facilities. Solutions for interpretation, accessibility, and other issues of health and safety already are being undertaken.

Again, I thank you for your carefully considered response to the draft GMP as well as our earlier products, and also for the

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We therefore recommend that the partners consider the retention of an experienced programming consultant to investigate, evaluate, and organize in an appropriate manner, the functional requirements of the four constituencies.

Background of the current plan

The National Park Service issued a Draft General Management Plan for Independence National Historical Park in August 1995. As part of the Philadelphia AIA's continuing involvement in helping to shape the planning for Independence Mall, the Chapter's Task Force on Independence Mall issued a Position Paper on June 7, 1995 that identified current problems of the Mall, and design principles and specific recommendations for the redevelopment of the Mall. The following discussion measures the Draft General Management Plan against those recommendations.

Alternative "E" - The Basis for this Analysis

In its Draft General Management Plan (GMP), the National Park Service identifies six (6) management alternatives for the future of Independence National Historical Park. These alternatives each have physical consequences but they are not physical plans in that they do not attempt to create a visual image for the Park. Instead, they identify management and planning strategies that will serve as a guide to long term planning. With specific regard to Independence Mall, each alternative describes a series of proposed changes to the Mall (including one that calls for no change) and further identifies general locations, by block, for each component of each proposal.

The GMP identifies Alternate E as the one preferred for future development. Alternate E describes an aggressive vision for the future of the Park, and the Mall in particular, that seeks to make it the focal point of the larger "Old Philadelphia District". The plan calls for the redevelopment of Independence Mall to include a new regional visitor center, the National Constitution Center, the Independence Institute, a Constitution Plaza, a new or enlarged Liberty Bell Pavilion and a building to house storage and maintenance equipment.

The greatest weakness of the GMP is that it does not identify a clear set of planning principles from which the various alternatives are generated. This has been painfully clear at each public presentation made by the Park Service. Despite repeated calls for making the underlying principles more explicit, the GMP continues to be largely silent on this issue, particularly with regard to strategies that have physical implications. We can only hope that any subsequent master plan be absolutely clear as to its planning principles, goals and presumed benefits. If it is not, the Park Service will leave itself wide open to legitimate criticism.

3

RESPONSES

4

thoughtful and collegial nature of your participation. I look forward to continuing the productive and rewarding relationship between the AIA and the NPS.

Sincerely,

Martha B. Atkins
Martha B. Atkins
Superintendent

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Evaluation of the Overall Plan

The National Park Service is to be applauded for adopting a plan that has the potential to remake Independence Mall as a dynamic focal point in the city. By including a variety of important attractions, the GMP acknowledges explicitly that the Mall has far more promise than its current condition and acknowledges implicitly that the grand symbolic open space of the current plan is outmoded and in need of change.

We recognize that Alternate E, while containing implications for physical design, is not a physical plan and in no way resembles what a proper master plan for the Mall should do. We also understand that the provision of a physical master plan is not within the legal mandate of the Park Service at this time. However, recent events, including the wide publicity given to a plan sponsored by former City Planning Director, Edmund Bacon, demonstrate the clear need for such a plan and the power that a physical vision can provide over text and diagrams.

The evaluation and discussion of the various alternative plans that have been proposed would be improved if certain design principles were more widely discussed and debated. It seems to us that it is essential, for example, to understand that Independence Hall is a small building in today's world.

Independence Hall has only two principal floors. The Chestnut Street facade reaches only 41 feet above the sidewalk. The brick base of the tower rises 68 feet to support the remainder of the tower which rises approximately 169 feet above the Street. It is only 106 feet wide although it is linked to adjacent buildings which fill out the block front. It is a building of detail; the tower is slightly off center to the west, the cellar windows are not all the same, and its east and west faces are different. It is, therefore, an urban building meant to be seen and confronted close up.

Good practice in urban design tells us that the best views of such a structure may be obtained from points within three times its height, or south of Market Street. Acceptable, but clearly distant views can be had for maybe twice this distance, or roughly to Arch Street, but beyond this distance, the building simply cannot be seen in a meaningful context. The fact that, for much of the day, one must look into the sun in order to see the north facade of Independence Hall only exacerbates this problem and reminds us that the oblique views are as important as the axial.

Much of the discussion about the nature of the open space of the mall has not yet been informed by the kind of careful and specific visual analysis necessary to enable us to understand what arrangement of space would best permit us to see and appreciate this iconic building. We are in agreement with many

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architects, the Park Service, and the City Planning Commission, all of whom have reached the conclusion that the Mall is too big, and that the placement of appropriate structures on the second and third blocks could actually improve the visitor's experience and the visual setting of this building. The size and design of the current mall has the unintended effect of reducing rather than enhancing the presence of the most important building on it.

Evaluation of Specific Planning Proposals of Alternate E.

Because Alternate E is fairly non-specific in its urban design recommendations, a point-by-point analysis of it compared to the AIA Position Paper is difficult. It is not our intention to stretch the meaning of various GMP proposals so that a comparison to our recommendations can be made. Nevertheless, it is fair to consider the possible, or likely, consequences of the various proposals. The following analysis is organized relative to the specific urban design recommendations in the AIA Position Paper:

1. Develop the northern block of the Mall.

Evaluation: The GMP recommends the redevelopment of the third block for the National Constitution Center (NCC), a picnic area and a multipurpose building for storage and maintenance.

Much has been made of placing the NCC on the third block rather than the second block, thereby requiring visitors to proceed north from a new visitor center on the second block to the NCC and south to the Liberty Bell and Independence Hall.

We do not share these concerns. As anyone who has been to a successful city knows, the packaging of attractions in some absolute linear fashion is neither functionally critical nor is it particularly urban. Visitors to the Mall manage to find their way to such diversely located attractions as the Liberty Bell, the Betsy Ross House, Franklin Court and the Mint, all without the benefit of a "world's fair" approach to packaging the visitor experience.

In the process, visitors experience the streets of historic Philadelphia, partake of our own diversity and cultural offerings, and share in our everyday experience - the exact qualities we admire when we visit other great cities like London, Paris and Rome, to name but a few. We have faith that the NCC has a compelling story to tell and will become a major attraction in its own right.

We are concerned that the NCC be given the benefit of direct access from the proposed visitor center and be given a clear

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physical presence relative to the first and second blocks so that, it acts as an anchor rather than an afterthought.

As to the proposed multipurpose building, we strongly urge the Park Service to solve this problem either off site, or, if it must be on the Mall, as an adjunct to larger public structures. In no instance should a new maintenance "building" be allowed to assume a noticeable presence on the Mall.

The proposed picnic area seems to us to be a generic suggestion made when no other development opportunities are evident. We continue to believe that developing the third block, with the goal of making it more part of the city, is important and, to that end, additional development (including private, tourist related development) is warranted.

We wish to further note that the third block is not the end of the spatial sequence of Independence Mall. Particularly with the possibility of some building on the northern block, the creation of better linkages to both Franklin Square with its open space and the monumental sculpture at the foot of the Benjamin Franklin Bridge represent important opportunities to introduce meaningful open space and connections to the historic plan of Philadelphia.

2. Respect the axis of the Mall.

Evaluation: The GMP is silent on this issue though the Alternate E diagram could be interpreted to suggest a linear arrangement of parts. Our point continues to be that the axis is available as an important organizer of both buildings and open space.

3. Envision the Mall as a series of public rooms.

Evaluation: Again, the GMP is silent on this issue. However, nothing in the GMP suggests anything to the contrary. The master plan will be the appropriate means of demonstrating a commitment to this goal.

4. Reconnect the surrounding sidewalks on 5th and 6th Street to the interior spaces of the Mall.

Evaluation: Alternate E points in the right direction by proposing the expansion of the sidewalks on 5th and 6th Streets through the closing of the parking lane adjacent to the Mall. Also, implicit in the suggested clearing of the second block is the recognition that its failure is in how it isolates the interior of the Mall from the streets.

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The master plan must go further. There needs to be a fundamental recognition that the streets are the primary public spaces of any city and that increasing the connections between the streets and the interior of the Mall can only invigorate the entire district.

5. Integrate the architecture of the Mall with equally powerful landscape design, signage and artworks.
Evaluation: The GMP does describe proposals for a new picnic area on the north block, retention of gardens and seating areas on the first block and a new Constitution Plaza on the second block, but does not elaborate on the need to integrate the design of the public realm with that of the proposed architecture. The point is seemingly axiomatic for the making of a great place. Yet, we know that the failure of many public places is precisely because the character of the architecture took precedence over the character of the spaces in between. We look to the master plan for convincing evidence of a commitment to this principle.
6. Relocate the Visitor's Center to the Mall.
Evaluation: The GMP not only proposes a new visitor's center for the Mall, but further defines it in regional terms so that it becomes the likely beginning of any visitor's experience in Philadelphia. Combined with the proposed Independence Institute and Constitution Plaza, the GMP outlines a strategy to remake the entirety of the second block, the weakest of the three blocks of the Mall. The GMP also recognizes that buses, cars and carriages that currently seem to park anywhere near the Mall, must be organized and regulated to mitigate their presence. We support these recommendations.
7. Build a Constitution Center on the Mall.
Evaluation: This topic was generally addressed above. A subtlety of the GMP is that it assumes the retention of the underground garage on the second block, thus denying its availability to the NCC. This may force the NCC to be largely above grade. We support that result, continuing to believe that a fundamentally underground experience is antithetical to a building devoted to the ideas of the Constitution.
8. Recognize and include common amenities of food concessions, toilets and gift buying.
Evaluation: The GMP does not discuss most commercial activities but does acknowledge the need for additional toilet

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facilities. The lack of discussion is of some concern to us in that it is easy to assume that such activity is not seen to be within the interests of the Park Service. While we believe that the inclusion of ordinary tourist activity can be an asset to the Mall, we also urge that studies be conducted of the surrounding buildings to demonstrate effective means of invigorating those areas with productive support uses.

9. Expand the existing partnership between the City of Philadelphia and the National Park Service.
Evaluation: The GMP describes Alternate E in terms of working cooperatively with the City. In fact, the announcement of the Alternate E as the preferred alternate was accompanied by an announcement of a partnership between the National Park Service, the City of Philadelphia, the National Constitution Center and the Pew Charitable Trust. These initiatives are all moving in the right direction. We believe that broadening the partnership through inclusion of a public Advisory Council would demonstrate a commitment by all parties to a process of development in full public view.

10. Undertake a comprehensive physical master plan for the Mall.
Evaluation: The GMP sets the stage for a master plan but does not call for the implementation of one. We have learned in subsequent conversations that the Park Service does not have the money or legal authority to initiate a master plan. However, the degree of public enthusiasm for changes in the Park is so strong that the Park Service, in conjunction with its partners, must find a way to undertake a master plan.

Such an undertaking needs to be done carefully and with public participation at least as extensive as that which was done for the GMP. The Park Service should not underestimate the time or degree of complexity involved in a master plan. In many respects, the master plan will be the most important and revealing design work associated with this entire endeavour.

11. The Liberty Bell
Evaluation: The GMP approach to the Liberty Bell is ambiguous, at best. While correctly stating that the bell belongs on the first block, in close proximity to Independence Mall, the GMP then calls for a new or enlarged pavilion to house it. Issues of new interpretive needs and/or better preservation of the bell are cited as benefits to be derived from such an approach. In a new

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pavilion, the bell is envisioned more in the center of the block and general reference is made to a new special events place between the pavilion and Market Street. In the enlarged current pavilion, the bell is presumed to stay more or less where it is now.

We continue to believe in the current location of the Liberty Bell and in the viability of the Liberty Bell Pavilion. On the first block, we are far more concerned with reconnecting the already successful gardens and seating areas to the surrounding streets and especially to the corners at Market Street. These kind of improvements will impact the viability and character of the entire block and can be used to relieve some of the spatial congestion created by the presence of the Liberty Bell Pavilion.

The plan's very specific assignment of locations to "high security" and "first amendment" activities is in some sense a departure from its otherwise very general approach. We think this proposal needs more consideration and review from a design professional.

Recognizing the desire of many constituencies to take symbolic actions in front of Independence Hall and/or the Liberty Bell, the Park Service plan identifies a need for both a "high security" area for visiting dignitaries in the southern portion of the first block, and a "first amendment" area for protest groups in southern portion of the second block. Both locations are within good seeing distance of the building. We believe that this programming decision should, however, be re-examined on the basis of authenticity. The reason both foreign dignitaries and protest groups wish to be seen in front of the Hall is because of the recognizable authenticity of the building and their position in front of it. If the "high security" area is viewed as more authentic than the "first amendment" area, then that's where the demonstrations will be. We believe that the security requirements can be met with largely unobtrusive provisions and that time zoning rather than space zoning may be the best means of recognizing these diverse requirements.

Other Design Issues

The Closure of Chestnut Street: The closure of Chestnut Street in front of Independence Hall is a well intentioned idea to recapture the continuity between Independence Hall and the first block. There are several ways to accomplish this goal without

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necessarily closing the street to all traffic. Additional studies should be made to reach an appropriate decision.

Other Parts of the Park: In the focus upon the Mall, it is important not to ignore the opportunities east of Independence Hall. Neither of the two banks, nor the Merchant's Exchange building is accessible to the public in a manner fitting with their attractiveness and the excitement that they create as authentic historic structures. Bringing these structures into the interpretive scheme of the park would materially enrich its message.

Summary

The announcement over the summer of the willingness of the Pew Charitable Trust to become a partner in the redevelopment of Independence Mall has completely changed the dynamics of the planning process. We recognize that there a few, if any, precedents for the kind of partnership being forged. Clearly, the engagement of the Pew Charitable Trust, along with the City of Philadelphia and the National Constitution Center, represent an unprecedented opportunity for coordination, albeit through uncharted procedural territory.

In anticipation of the suddenly real possibility of a new visitor center on the Mall, the need for a master plan takes on new urgency. The master plan is an opportunity to explore the real consequences of the generalized planning described in the GMP. Recognizing that the design process is a tool that can be used to inform previous as well as future decisions, we strongly recommend that the master planner be given two essential tools as part of their charge:

1. Flexibility to explore a wide range of programmatic and physical relationships between all of the recommended components described in the GMP. While Alternate E should be used as a starting point, this flexibility should extend to alternatives that do not exactly conform to the block designations described in Alternate E.
2. Appropriate time to explore various options, receive considered feedback from stakeholders and the public, identify a preferred option, develop the preferred option and present it publicly for review and comment. The National Park Service should strongly resist the establishment of an unrealistically short master plan schedule.

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The development of the GMP has often appeared to move at a glacial pace. Indeed, it is appropriate for decisions affecting such an important place to be carefully considered. However, both the opportunities represented by potential benefactors and the emerging tourism plan of the City cry out for more rapid progress. The signage for the area is, for example, poor and ineffective. There is no reason why signage cannot be improved now, in concert with larger and more important improvements to come later. It is important that the partners cooperate to bring this about. If the partners are still in conflict about fundamental aspects of the plan, then the likelihood of outside support which is desperately needed is lessened. It is therefore in the interests of all parties to retain the programming and design assistance required, and move forward to make the critical decisions necessary to prepare this park for the next century.

Acknowledgement

We understand and appreciate the extraordinary steps that the National Park Service has taken in the adoption of a preferred alternative that sets the stage for tremendous redevelopment of the most important space in Philadelphia. We congratulate the Park Service for incorporating a good deal of sound public advice and wish to express our gratitude for the guidance of committed Park Service staff, particularly those associated with Independence National Historical Park and the Mid-Atlantic Region who know our city intimately and have worked to make this management plan a good starting point for historic changes.

November 17, 1995
Philadelphia AIA Task Force on Independence Mall

COMMENTS

Center City Conservancy Conserving and Promoting Urban Assets

1137 LOMBARD STREET
PHILADELPHIA, PA 19147
TEL 215-522-0382
FAX 215-522-1507

RONALD B. LEVINE
PRESIDENT

24 October 1995

Mary Aikens
Superintendent
INDEPENDENCE NATIONAL HISTORIC PARK
313 Walnut Street
Philadelphia PA 19106

Dear Ms. Aikens:

We are arriving at a particularly momentous time in the recent history of the Independence National Historic Park. Several plans have been proposed for a "second-generation" park development and we feel it is time to re-evaluate what the park is and hopes to be.

At the outset, it is important to note that we do not advocate one plan over another. Several scenarios have been promulgated by your office as well as the Mayor's office for the Constitution Center and the proposal by former City Planning Commissioner Ed Bacon. This flood of interest is indicative of the obvious public and professional interest in park improvements and concern that whatever is done must be done with an emphasis on enduring quality.

In this regard, our primary concern is that too much emphasis is given to expediency (i.e., serving present needs efficiently, within the site as given and within the budget as allocated) without a broader view of what *future* needs the park should serve. Strictly from a practical standpoint, Independence Park no longer exists as a unique attraction but must be seen from the broader perspective as one site that must compete with others for consumers in the "theme park" marketplace. This lesson has already been learned in the commercial sector by developers in Las Vegas and Orlando, who have taken basically "bare earth" locations and converted them into attractions where tourists not only flock, but stay for long periods of time. Even in the non-profit sector these lessons have been learned. In Washington the Smithsonian and the Holocaust Museums have developed large-scale, imaginative environments that attract visits—and repeat visits.

Unfortunately, such imaginative thinking as yet to emerge in the present Independence Park plans. It is critical at this early point to look at these and other tourist venues and develop a market-driven mentality. Certain common features emerge from examining these sites: (1) relatively intangible concepts, such as the constitution, can be reified by exciting multi-media displays; (2) museums can become popular attractions if they are built on a scale and with a sense of drama to maintain attention; (3) tourists will stay longer if passage through the environment is made interesting enough to encourage extended exploration.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY REFER TO:

D18 (INDE)

January 22, 1996

Mr. Ronald B. Levine
President
Center City Conservancy
1137 Lombard Street
Philadelphia, Pennsylvania 19147

Dear Mr. Levine:

Thank you for your letter regarding planning for Independence National Historical Park. You express concern over the park's value and role in tourism development. We too have given a great deal of thought to this subject and I'll synopsise our conclusions.

We agree that the development of heritage tourism is of great economic value to the city and region. Although our Congressionally mandated mission is preservation and interpretation, and not tourism development, the park currently draws the most visitation of any regional resource and provides a spinoff of visitors and their dollars to neighboring institutions and commercial enterprises. While our proposed improvements to our operations and facilities will slightly increase visitation above our normal annual increases, more importantly, it will substantially increase the quality of each visitor's experience, which is our primary concern.

Philadelphia has an excellent national park and many additional magnificent cultural and historic attractions - the necessary basics for heritage tourism development. What's missing in Philadelphia's heritage tourism picture is coordinated promotion, ease of obtaining information, safe, clean streets, and a protected, restored historic district. The city's current mayoral administration is working hard on these needs and deserves a great deal of credit for accomplishments thus far.

The park will continue to play an important role in tourism by providing the educational and inspirational rewards that visitors

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THE CITY CONSERVANCY
TO: M. Alkens
24 OCT 95, p. 2

All of these features will require that we raise our expectations of what constitutes an acceptable park design, but certainly we can be better assured that, given this effort, we are likely to produce a facility that will attract and educate a far greater number of Americans to their heritage of freedom and constitutional government than what we have had in the past 40 years.

We hope you will take these suggestions in the spirit with which they are intended—we all want the best for Independence National Park.

Sincerely,



Ronald B. Levine
President

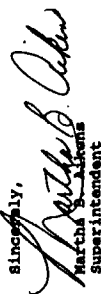
RESPONSES

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expect from a trip to a national park. We believe this wonderfully complements the many other types of experiences that the city provides to visitors.

Thank you again for your interest.

Sincerely,



Martha S. Alkens
Superintendent

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COMMENTS

RESPONSES

Descendants of the Declaration of Independence

Officers, 1995-1996

President-General: RICHARD H. CORSON, MD
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200 N. 15th Street, Philadelphia, PA 19106
Secretary: JAMES A. HENRY, JR.
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Chairman-Committee: JAMES A. HENRY, JR.
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Honorary Advisory Board: JAMES A. HENRY, JR.
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Descendants of the Declaration of Independence

Board of Governors, 1995-1996

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200 N. 15th Street, Philadelphia, PA 19106



United States Department of the Interior
NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

January 22, 1996

Dr. Richard H. Corson
President-General
Descendants of the Signers of the Declaration of Independence
106 Country Club Road
Batesville, Maryland 38606

Dear Dr. Corson:

Thank you so much for your letter and for your organization's continuing support of Independence National Historical Park. I am grateful for your understanding of the values inherent in the park and of what we, as stewards, are trying to achieve through the General Management Plan. I particularly appreciate the inclusion in your newsletter of information regarding donation opportunities.

I couldn't agree more with the concept of interpretation you have described. It is a policy of the National Park Service simply to give our visitors unbiased information in such a way as to provoke them to form their own interpretations and opinions. As you note, that approach is particularly important at this park and it is the approach we will continue to use.

For over two centuries, the area that is now the park has been a site for citizens to exercise their first amendment rights, and we believe it is a valuable and thought-provoking experience for our visitors to witness such activities. Large and/or noisy events have the potential to disrupt the enjoyment of visitors, however, and that is why the proposed plan seeks to locate such events in a specially designed and receptive space, beyond the historic core of the park, (to be called Constitution Plaza) on Independence Mall. Participants in these events would still be within sight of the Liberty Bell and Independence Hall, and day-to-day

September 11, 1995

Martha B. Aikens, Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, Pennsylvania 19106

Dear Ms. Aikens,

Thank you so much for having sent to me the National Park Service's proposals for the future development of Independence National Historical Park (INHP). The DSDI is pleased to support the continuing preservation of the site where our nation's birth occurred. Our newsletter contained material regarding the various funds to which money can be donated for the continuation of this work, along with a "Message from the President" urging support of the INHP project by the membership.

In reviewing the options outlined in the INHP newsletter, I find the favored concepts far reaching and appropriate. This is particularly so in that the park is viewed in the context


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of colonial America, as reflected by the colonial Philadelphia neighborhoods adjacent to the park and in the light of the political scenario of the era.

I do have concerns with the concept of an interpretation as promulgated by a governmental agency as the correct one. Instead, I favor giving the individual visitor an unbiased and thorough background so that he or she can make an informed interpretation that the individual alone believes is intellectually correct. This approach is much more compatible with the Quaker heritage of the area which places great value on individual thinking and interpretation. I would hope that whatever "interpretations" there are would be minimal as the importance of the events that took place there is self-evident.

The use of the site for First Amendment activities is a two edged sword. While the historical activities that occurred at Independence Hall are truly examples of First Amendment activity at its finest, the scope of activities permitted by current Supreme Court interpretations could result in desecration of the park verbally as well as physically. Making INHP a designated site for such activities would expose it to greater risk than already exists. It seems to me that giving the INHP such a special designation opens a can of worms that shouldn't be opened.

DDDI wishes you and your associates well in your endeavours and should we be able to help please don't hesitate to call on us.

Sincerely,

 Richard H. Corson, M.D.
 President-General

RHC:rcp

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cc: R. Gibson, NEF, M. Manning


RESPONSES

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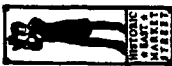
visitors would have the choice to view and participate in the events or not. We believe that this is an exciting solution that will protect the interests of all citizens as well as the integrity of the historic resources.

Thank you again for your support.

Sincerely,


 Martha B. Atkins
 Superintendent
 Independence National Historical Park

COMMENTS



November 17th, 1995

Roger Kennedy
Director
National Parks Service
1849 C Street
North West
Washington, DC 2020

Dear Mr. Kennedy:

As president of Historic East Market Street (HEMS), we must register our strong opposition to the Park Service's plan to close Chestnut Street from 6th to 5th Streets.

Over the last four years, HEMS has actively worked with PENNDOT, the City and the Federal government to raise over \$6,000,000 to completely reconstruct Market Street from 5th to Front Streets. This effort focused on recreating a streetscape that would be attractive to pedestrians and also be compatible with the existing historic structures. This section of Market Street may be the longest, continuously operated commercial area in the country. It was the site of many significant firms for our Nation, such as the Post Office at Franklin Court. It will be severely impacted by the Park Service's Plan to close Chestnut Street.

The Park Service's transportation consultants' study clearly indicated that the traffic volumes are such that the level of service is worse at the intersection of Market and 5th Streets. This extremely poor level of service will be exacerbated by the reduction of additional traffic from Chestnut Street on to Market Street, thereby seriously overloading an existing problem.

We too are committed to creating a vibrant experience that will facilitate the ease of movement and access to the entire Historic area. We are eager to work with you to minimize the Park Service's plan's debilitating impact on its equally historic neighbors.

Sincerely,

Stanley F. Taralla
Stanley F. Taralla
President, HEMS

cc: Martha Atkins

cc: 1995 and 1996, Philadelphia, PA 19103
215-567-7900

PA 19103 and 1996, Philadelphia, PA 19103 1996-100 017, 771 1996-1000 0707

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY REFER TO

D18 (INDE)

January 22, 1996

Mr. Stanley F. Taralla
President
Historic East Market Street
48 1926 Arch Street
Philadelphia, Pennsylvania 19103

Dear Mr. Taralla:

Thank you for your letter of November 17 regarding the General Management Plan for Independence National Historical Park. Roger G. Kennedy, Director, National Park Service has asked me to respond. I appreciate Historic East Market Street's (HEMS) concern over the potential impact to Market Street of the proposed closing of the 500 block of Chestnut Street.

As you note, the study by Orth-Rodgers and Associates, Inc. identifies the level of service at 5th and Market Streets as "Level F." A follow up draft study of mitigation measures related to the proposed closing of Chestnut Street identifies means to improve that service to "Level C." A copy of this document will be forwarded to you when it is completed.

We are working with the City of Philadelphia to further study the impacts of closure and possible solutions to the impacts. As you may realize, a final decision on the proposed closing is the responsibility of the city, and not the National Park Service. While our first responsibility is the safety of visitors and the protection of the park's fragile historic resources, the park will continue to be a good neighbor.

I am grateful for HEMS' ongoing support and interest in the park and will work with you to resolve this concern.

Sincerely,

Martha A. Atkins
Martha A. Atkins
Superintendent

COMMENTS

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cc: D. Aikens

DANIEL P. JORDAN
President

September 7, 1995

Ms. Martha B. Aikens, Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, Pennsylvania 19106

Dear Martha,

Now that I finally have had time to review your GMP materials, which are both attractive and accessible, I wanted to write to extend congratulations to you and your staff for all the care and thought that is so clearly evident in them. You have made a powerful case for Alternative E. I particularly like using the mall as a gateway, and anchoring it so substantially in Block Two with the regional visitors center, an educational facility, etc.

Your plan, I believe, dramatically enhances the fulfillment of your mission of preservation, education, and partnering, and I was particularly delighted to see that the interpretive themes build upon past successes.

It was an honor and a pleasure to have had even a very small part in the planning process, and I extend my congratulations and admiration for all who worked on your GMP so long, so hard, and so intelligently.

We would still welcome a visit anytime, even on short notice. Meanwhile, all the best.

Sincerely yours,

Dan

Daniel P. Jordan
President

DPJ:mba

THOMAS JEFFERSON MEMORIAL FOUNDATION, INC.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

ON REPLY AFTER TWO

D18 (INDE)

January 22, 1996

Dr. Daniel P. Jordan
President
Thomas Jefferson Memorial Foundation

Dear Dan:

Thank you for your delightful letter. It was absolutely a ray of illuminating sunshine in a cloudy landscape. I will pass it on to the planning team, who will be pleased to receive encouragement from such a distinguished reviewer.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

COMMENTS

NOV-28-1995 23:12

NOCR-NEO

P. 82

National Parks
and Conservation Association

NORTHEAST REGIONAL OFFICE

20 November 1995

Martha Aikens, Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, Pennsylvania

Dear Ms. Aikens:

The National Parks and Conservation Association (NPCA) appreciates this opportunity to comment on the draft general management plan for Independence National Historical Park. NPCA is America's only private only private nonprofit citizen organization dedicated solely to protecting preserving and enhancing the U.S. National Park System. An association of "Citizens Protecting America's Parks," NPCA was founded in 1919, and has more than 450,000 members, over 25,000 of whom are Pennsylvania residents.

The National Parks and Conservation Association supports the selection of Alternative E as the preferred alternative for the General Management Plan. We believe that Alternative E offers the best opportunity for the park and its partners to carry out its mission as authorized by Congress and as mandated by the Organic Act, as well as to carry out the park's management objectives. The preferred alternative preserves and highlights the historical resources which are the foundation of the park. In addition, the preferred alternative expands the possibilities for an outstanding and rewarding visitor experience.

Regarding the specifics of the draft document, NPCA does have a number of questions and comments on the draft general management plan that we would like see addressed and incorporated into the final plan.

MANAGEMENT GOALS AND STRATEGIES

NPCA strongly concurs with the management goals and strategies outlined in the draft general management plan (p.24.) Under *Strengthening Independence Mall*, the goals should be not only to respect the historical resources, but highlight them as well. Any new developments on the mall must support the historical resources.



Northeast Regional Office
P.O. Box 382372, Cambridge, MA 02238-2372
Tel: (617) 354-8940 • Fax: (617) 351-8635

National Office
1776 Mass. Ave., N.W., Washington, D.C. 20036
Tel: (202) 223-6722 • Fax: (202) 659-0650

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

January 22, 1996

Eileen Woodford
Northeast Regional Director
National Parks and Conservation Association
PO Box 382372
Cambridge, Massachusetts 02238-2372

Dear Ms. Woodford:

Thank you for your letter of response to the draft General Management Plan (GMP) for Independence National Historical Park. I am pleased that you recognize the opportunities that the preferred alternative offers to fulfill the park's mission and management objectives, and to expand the visitor's experience both in the park and the historic districts of the city. Please allow me to respond to and clarify some of the points you have made in your letter.

Concept. The proposed interpretive themes are extensively described on pages 16 through 23 of the draft GMP. The August summary of the plan included descriptions that were synopsized from the full plan. Each alternative proposes interpretation of all five themes, but would emphasize them differently. The final GMP will clarify the approach to interpretation of the preferred alternative.

Park Development Zone/Facilities. Several options were considered during the planning period to address the park's operational needs. Within the east-west blocks of the park - the historic core - there is no space that might accommodate or be appropriate for a maintenance building. The Cultural Landscape Report determined that the third block of Independence Mall was not historically significant and could be considered for new supporting functions. With staff reductions and increased operational responsibilities, it is critical that the intensive level of proposed new development on the mall be accompanied by appropriate measures for park operations, including visitor protection and minimal storage. Please be reassured that no stand-alone building will be seen by users of the mall or people driving by on adjacent streets, as it is likely that the functions identified for this building will be accommodated within another proposed structure. The precise design treatment, location, size and configuration of this structure will be determined in future design studies, and shared with the public at that time.

COMMENTS

NOV-28-1995 23:13

NPCA-NERO

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CONCEPT

The document needs to clarify its explanation of specific interpretive themes and their exact relationship to the alternatives, especially the preferred alternative. Although the draft general management plan does outline the historical background of the park (p. 16), it does not specifically highlight the themes. The summary of the draft management concepts issued this past summer gave a much more detailed description of the particular themes than the draft document. Clarification is important because the interpretive themes should be a key force behind the development objectives for the park.

PARKWIDE ACTIONS/OPERATIONS AND ADMINISTRATION

Park Development Zones/Facilities

The National Park Service has made a strong case for a larger, more functional and more appropriately situated maintenance facility; however, the third block of the mall--or anywhere on the mall--is not an appropriate location. NPCA strongly objects to this aspect of the preferred alternative. Independence Mall should be used for services supporting the visitor's experience of the historical resources, including interpretation and education, as well as for an open space for gathering, the mall is a public place for public activities. A maintenance facility would detract from the historical resources and from the visitor services that the other facilities and spaces would provide. NPCA urges the National Park Service to find another, more appropriate location for the maintenance facility.

Partnerships and Cooperative Agreements

With a \$33.4 million cost estimated for the preferred alternative and with Congress stepping away from its responsibility to support the National Park System, it is clear that the National Park Service will need to rely on partners and cooperators implement the general management plan. It is absolutely imperative that none of these partnerships or cooperative agreements lessen the role of the National Park Service as steward of the historical resources or the public land at Independence National Historical Park.

The draft document, and Alternative E in particular, does not reassure us that indeed, NPS will be the steward of these resources as mandated by law. NPS must retain final approval power over the activities of its partners and cooperators.

NPCA believes strongly that the park, as part of this general management plan, NPS needs to review all of its current partnership and cooperative agreements to determine how they fit in with the preferred alternative.

In addition, since many of these partnerships involve physical developments, NPS should give a definitive time frame for these entities to carry out their obligations. The park should not be tied to a partnership described in the draft general management plan if that partner is not able to carry out its obligations by a certain date. Rather, the Park Service should be free to seek other partners and cooperators to carry out the plan.

2

RESPONSES

2

Partnerships and Cooperative Agreements. As the implementation of the CMP proceeds, the National Park Service (NPS) will continue to be the steward of the resources comprised by Independence National Historical Park, as is mandated by law. The park's existing and future cooperative agreements do and will require that the National Park Service retain final approval over activities of others operating within park boundaries. In addition, it is the policy of the park to review all agreements as they are due for renewal, and each will be considered in light of the provisions of the CMP at their appropriate time.

The park will work closely with all partners and cooperators to define mutually beneficial activities, with consideration given to the ability of the parties to fulfill their respective obligations. Nothing in the CMP ties functions to specific partners, unless connections are already defined by legislation or existing cooperative agreements.

Independence Mall. We agree that a number of questions on urban design issues remain to be answered for Independence Mall. We hope that a design process will be initiated this spring. Such a process would be open to public participation.

National Constitution Center (NCC). The federal legislation that established the NCC and the cooperative agreement, based on the legislation, assigns the authority and responsibility to oversee and approve plans and programs developed by the NCC, to the NPS.

Multipurpose Building. The purpose of this building (or of space within another building) is to provide storage for bulk materials; parking for maintenance equipment that serves the mall, and a small facility for visitor protection. We have concluded that it is both appropriate and necessary to locate the facility where it is needed.

I want to thank you personally as well as the National Parks and Conservation Association for your thoughtful consideration of the draft plan, as well as your support and consultation throughout the planning process. You are a valuable partner to the park.

Sincerely,

Martha B. Atkins
Martha B. Atkins
Superintendent

RESPONSES

COMMENTS

NOJ-28-1995 231:13

NPO-NEED

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Circulation

NPCA is very pleased that the preferred alternative removes distracting buses from the historic view in front of Independence Hall. The park will have to accommodate some visitors offloading near Independence Hall, especially disabled and elderly visitors coming to the park on organized tours.

We are also pleased with closing Chestnut Street between Fifth and Sixth Streets to traffic. This will help visitors enjoy the approach to Independence Hall without worrying about traffic hazards.

URBAN DESIGN/SITE-SPECIFIC ACTIONS**Independence Mall**

Alternative E addresses the needs of the complex urban ecology of Independence NHP in a way not found in any of the other alternatives. Foremost, it connects Independence Mall both programmatically and physically with the rest of the park. Construction of a regional visitor center and Independence Institute on the second block of the mall will draw visitors from all parts of the city and will direct visitors to both the historical zone of the park and the National Constitution Center, located on the third block.

The draft general management plan must still address some key issues, however. The draft document, for the most part, outlines proposed actions for specific sites well. The document does not, however, articulate any overarching urban design considerations for the mall, the park's development zone. NPCA feels very strongly that there is an absolute need for an urban design plan to guide physical development of Independence Mall. The site-specific action proposed in the alternatives, whether it be the visitor center, National Constitution Center, Liberty Bell pavilion or a memorial to Judge Edwin O. Lewis, should not be designed as separate entities plopped down in their designated places. Rather they must work together to form a cohesive visual whole. Without an urban design plan to guide development on the mall and relate it to the historical zone, the National Park Service runs the risk of producing disjointed and separate construction projects that do not meet the Management Goals and Strategies described in the draft document (p.24.)

Given the global importance of Independence NHP, NPCA strongly urges the National Park Service to secure the services of a world-class design firm to develop an urban design plan for the park and the mall. This plan must be developed before the design for any single facility begins.

In addition to physical and visual cohesion, the urban design plan must reflect the park's interpretive plan. Its not enough that the buildings look good together, they must work well together from the standpoint of the interpretive themes of the park.

NPCA agrees with the draft general management plan's intention for the mall (p.45.) The mall should be "dignified, inspirational, a place that allows people to

COMMENTS

RESPONSES

NOJ-28-1995 23:14

NPOH-1650

P. 05

contemplate, reflect, reverse, and learn, a place that is classic, enduring, and humanly proportioned." This intention should be the underlying qualities of the urban design plan.

The importance of the individual pieces of the preferred alternative, such as a new Liberty Bell pavilion, the visitor center and the National Constitution Center, demand architectural design that is also world-class, but is contextual and does not detract or remove the focus from the historical resources. Each building must have its own identity and be architecturally significant, but each must fit into the contextual whole and highlight the historical resources. Flash and glitz are not the design imperatives here; thoughtfulness, beauty and context are.

National Constitution Center

More binding language is required to describe the scope and scale of the proposed National Constitution Center. Under no circumstances should the size and scale of the center "be determined by the NCC's program as developed through consultation with the National Park Service." The National Park Service must retain final authority in determining the proper size and scale of the center as it fits in with the park's overarching urban design plan. Anything less is unacceptable.

Our greatest fear with regards to the National Constitution Center is that, sometime in the future, the park may find itself operating an extremely expensive facility for which it has no funding. Provisions must be made to protect the park from having to take over the development, construction or operations of the National Constitution Center in case the nonprofit organization fails.

In addition, NPCA, while understanding the National Constitution Center's congressional mandate, has strong reservations about a private entity having so much control over the interpretation of such a public and living document. The Interpretive Plan of the park is subject to public scrutiny. No such guarantee of public oversight exists with the National Constitution Center's interpretation of the United States Constitution. Any contractual agreement between the Park Service and the National Constitution Center must include a provision for the Park Service to review and approve the center's interpretive plan.

Multipurpose Building (Third Block)

This building seems to not have a specific purpose, except to house a maintenance facility which we have already stated is inappropriate for the mall. The draft general management should outline a specific program for the building more clearly or drop it from the plan.

ECONOMIC DEVELOPMENT

The City of Philadelphia has a right to expect some considerable economic return on tourism generated by Independence National Historical Park. Building and sustaining the economic viability of any urban center in this country is a monumental challenge and should be aided whenever possible. Independence NHP, by virtue of its one and a half million visitors each year, is an important contributor to the city's economy. However, in

RESPONSES

COMMENTS

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that role, a balance must be struck whereby the city and its businesses are able to capitalize on that visitation to the greatest extent possible while not jeopardizing the physical integrity of the park or by overwhelming its Congressionally mandated mission.

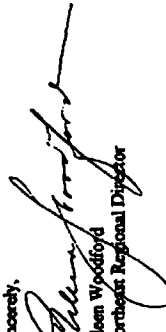
Alternative E, through its inclusive urban design that embraces the entire geography of the park, comprehensive circulation plan that facilitates visitor access to both the park and the city, widely encompassing interpretive program, and more extensive partnerships that includes the city and nonprofits strikes that balance so necessary for a national park.

Conclusion

The sole objective of the chosen alternative must be to protect, preserve and enhance the historic resources of the park while telling the story of those resources. NPCA believes that Alternative E accomplishes this objective in the best way possible. The preferred alternative of the draft general management plan has the potential to transform Independence Mall into a living commemoration of the birth and early years of the American Republic.

NPCA wishes to commend all of the National Park Service staff who have worked so diligently on the general management plan and the inclusive public process surrounding it. Their professionalism and competent efforts are a credit to the Service. I look forward to the final general management plan for Independence National Historical Park.

Sincerely,


Ellen Woodford
Northeast Regional Director

COMMENTS



Philadelphia Building and Construction Trades Council - AFL-CIO

2791 SOUTHAMPTON ROAD, SUITE 100 • PHILADELPHIA, PENNA. 19154 • (215) 677-4500

EDWARD C. KESNAN
President

PATRICK B. GILLESPIE
Secretary-Treasurer

October 23, 1995

Ms. Marie Rust
Field Director - NE Field Area
National Park Service
Customs House, Room 306
Philadelphia, PA 19101

Dear Mr. Rust:

The purpose of this letter is to state for the record the Philadelphia Building and Construction Trades Council's position on the much-needed development of the mall at Independence Park.

The National Constitution Center has a proposal that seems to be well thought out and doable. It is high time that we as Philadelphians develop the strategy whereby we can share the national treasures with the rest of America (instead of guarding them).

I know how these issues can develop into turf wars between different interest groups. I hope that with this national symbol of our country's independence we do not fall prey to such parochial thinking.

Our members at the Philadelphia Building Trades stand ready to do whatever is necessary in helping you bring about a meaningful, useful and effective revision to the public meeting space at Independence Hall.

Respectfully yours,
Patrick B. Gillespie
PATRICK B. GILLESPIE
Business Manager

PBG/en

opeiu #14
afl-cio

FRANK BURDETTE JOHN DAVENPORT Vice Presidents THOMAS KELLY JOSEPH RAFFERTY

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

BY FAX/STREET TO

D18 (INDS)

December 15, 1995

Mr. Patrick B. Gillespie
Business Manager
Philadelphia Building and Construction Trades Council
AFL-CIO
2791 Southampton Road, Suite 100
Philadelphia, Pennsylvania 19134

Dear Mr. Gillespie:

Thank you for your letter regarding development of Independence Mall. Marie Rust has passed it on to me for my consideration.

The National Park Service strongly supports the concept of engaging Americans in learning more about the U.S. Constitution and believes that the National Constitution Center (the Center) is a worthy organization that can achieve this. We have demonstrated our faith by the very rare act of offering the Center space within a national park. We are working with the Center, the City of Philadelphia, and a host of organizations to bring about necessary and appropriate redevelopment of Independence Mall.

"Sharing" and "guarding" our national treasures certainly are not mutually exclusive. In fact, the mission of the National Park Service comprises both in equal measures (we refer to it as interpretation and preservation). Failing to guard these treasures would mean that just a little way down the road, there would be nothing to share!

I have enclosed a synopsis of our proposal for the park. I appreciate your organization's willingness to aid in redevelopment of the mall. We hope to begin detailed design next year, and I invite you to stay involved.

Sincerely,

Matthew B. Atkins
Matthew B. Atkins
Superintendent

enclosure

COMMENTS



Philadelphia chinatown development corp. • 1011 race st. • phila., pa. 19107 • (215) 322-3158

November 15, 1995

Ms. Martha B. Aikens
Independence National Historic Park
313 Walnut Street
Philadelphia, PA 19106

Dear Ms. Aikens:

The Philadelphia Chinatown Development Corporation (PCDC) is submitting our response to the Draft General Management Environmental Impact Statement for Independence National Historical Park.

Chinatown has existed in the shadow of the Liberty Bell for all its history. The proposed project affects our area as our eastern boundary is on 8th Street and Race Street bisects our core community.

Our comments on the Draft Environmental Impact Statement are as follows:

Historical Context (Page 6)

Chinatown is a historical area over 125 years old and is one of the closest communities to the proposed project. In fact, the Independence Mall Unit IV Urban Renewal Project caused demolition of all houses and businesses in Chinatown east of 9th Street, from Vine to Arch, which resulted in a 25% demise of our community.

PCDC would like to state that since other churches are mentioned in the draft, the Holy Redeemer Chinese Catholic Church and School is omitted. Holy Redeemer is a historical site built in 1941 and is the first church built for Chinese Catholics in the United States.

Regional Visitor Facilities & Services (Page 15)

It should be noted that Chinatown, an adjoining Special District, provides many of the services that visitors seek such as hotels, restaurants, ethnic foods and wares, herbs, shops, religious facilities, etc.

The Interests of The Parties (Page 36)

Chinatown is omitted as a neighborhood. Chinatown, a viable residential and commercial district which borders the Mall to the west along with Franklin Square, one of the original squares that William Penn chose as his "Green Country" parks. Chinatown is one of the oldest ethnic neighborhoods in the city that has not only remained stable but has grown for over 125 years.

費城華埠發展會

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY REFER TO:

D18 (INDE)

January 22, 1996

Ms. Cecilia Moy Yep
Executive Director
Philadelphia Chinatown Development Corporation
1011 Race Street
Philadelphia, Pennsylvania 19107

Dear Ms. Yep:

Thank you for your letter regarding the draft General Management Plan (GMP) for Independence National Historical Park, and for the time given during your board meeting to allow Delandre Gibson and I to explain the GMP. We enjoyed our visit and found the discussion to be productive in achieving mutual understanding of our needs as neighbors.

After considering your letter and speaking with the PCDC Board, we feel that we were remiss in failing to include Chinatown as a residential neighborhood affected by visitation at the park. We had previously reasoned that institutions such as the Federal Reserve Bank, the federal office building, Philadelphia Police Headquarters and other large buildings preclude a direct physical connection between the park and the neighborhood. We appreciate your help in developing our awareness of the flow of commerce, residents, and visitors between the park and Chinatown.

A number of the comments in your letter note corrections that are needed to our draft plan. The final GMP, however, will be abbreviated, and will not include some of the draft chapters with items which merit correction. Please know that we continue to be aware of your comments, and that your letter will be printed in its entirety in the final document even though some of the draft text needing correction may not appear. In the chapters that are retained in the final plan, your corrections will be made.

Please let me clarify some of your points that were addressed in the draft GMP.

Assessment of Impacts. Noise, air quality, and traffic concerns are addressed between pages 167-200 of the draft GMP. Additional traffic information is being compiled in response to your comment and that of other organizations and individuals. The results will be incorporated in the final GMP.

COMMENTS

*Downtown East/
Convention Center
(Page 149)*

In your 3rd Paragraph there is a misstatement of fact that "there is no apparent development activity in Chinatown." Plans have been on the drawing board for 51 units of new housing at 8th and 9th, Vine to Callovhill Streets since 1990. Acquisition has been complicated and delayed because a parcel is part of the Right of Way for the Vine Street Expressway at 8th St.

*Community Facilities
Education (Page 151)*

Holy Redeemer Chinese Catholic School is also omitted as an educational institution. It is located at 9th and Vine Streets. Holy Redeemer teaches grades 1 through 8, with 220 students in attendance. At present Holy Redeemer is the most significant gathering place in the area, providing educational, recreational and social services.

*Assessment of Impacts
(Page 167)*

This Draft Environmental Impact Statement did not address the noise, and dirt, traffic congestion that all effect the environment, particularly during construction.

*Impacts of Circulation
(Page 173)*

This is of most concern to Chinatown. The DEIS states that removal of buses from on-street parking could have numerous positive benefits, however, the DEIS did not identify where the buses would be moved to. Would this not only negatively impact any other area that they may be moved to? If not, why not?

The relocation of bus parking sites must be identified. Since Race St. is eastbound, how will all this additional bus traffic impact our neighborhood? Alternative E, selected by the National Park Service as the preferred alternative, might improve the Old Philadelphia District, but, presently, Chinatown is already negatively impacted by the combination of traffic from the bus terminals at 10th St. (Greyhound) and 11th St. (Peter Pan) and all tour bus companies that now flow through Race and Arch Streets. Therefore, Chinatown will be seriously affected by any additional traffic flow that results from this proposed project. In addition, since the PA Convention Center is also located at 11th and Race Streets, resolution for traffic congestion as mentioned on Page 83 is a serious concern and should be addressed now, not later with cooperative groups who are not identified. Alternative E also states that Race Street is the arrival area for visitor loading and drop-off, the underground garage and for the proposed special events. We insist that the circulation flow of traffic be addressed now and in more detail as Chinatown would be the neighborhood most affected.

*Irreversible & Irretrievable
Commitments of
Resources (Page 182)*

Also, how will Chestnut St. closure impact Race St.? See Alternatives C, D, E.

RESPONSES

2

Impacts of Circulation. The City of Philadelphia is working to identify short and long term locations for parking school and tour buses after they drop off their passengers in the historic neighborhood. As this writing, these locations have not been identified. The city is aware of your concern, however, that the locations not impact Chinatown or future Chinatown development north of Vine Street.

Our traffic studies have noted that most of the tour and school buses that are traveling to the park arrive via Interstate 676 and proceed down Sixth Street. We agree with you that signage on the Interstate need to be improved to make it absolutely clear to travelers that Sixth Street is the proper exit for the park, so that they do not use Broad Street or Eighth Street, causing them to crowd Chinatown. We communicate regularly with the Philadelphia Convention and Visitors Bureau and with most of the tour operators who bring buses to the park. We will add your concerns to our ongoing efforts to inform and orient the operators, encouraging them to avoid Arch and Race Streets. We know that you recognize, however, that Chinatown is an attraction in itself.

Irreversible and Irretrievable Commitments of Resources. Our existing traffic studies and early results from those that are now underway show that closure of the 500 block of Chestnut Street will have little or no impact on Race Street. As you noted in our meeting, however, the possible loss of seven parking spaces on Seventh Street would worsen the overall parking situation.

A rapid ethnographic assessment procedure (REAP) was completed in the spring of 1995 that provided a general overview of cultural groups that may have associations with the park. Using four criteria: proximity, symbolic identification, cultural activities, and demographics, five communities were contacted to participate in the procedure. Representatives of the Chinese community were contacted in the course of the procedure, although we regret that the PDCC was not contacted at that time. Additional background information on the procedure can be found on page 116 of the draft GMP.

Executive Order 12898 is intended to assure that costs and risks of federal environmental decisions do not fall disproportionately on minority and low income populations and communities. Impacts of implementing the preferred alternative were assessed for the Center City and historic downtown areas, which include Chinatown. While there would be minimal short-term impacts during any construction activity, no disproportionately high negative impacts were found in the Chinatown area, or in any area adjacent to the park.

COMMENTS

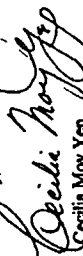
Our final comment, the third paragraph on Page 172 states:

In accordance with Executive Order 12898 of February 11, 1994, which requires that any federal action consider impacts to minority or low-income populations, consideration was given to specific groups that could be affected. No such impacts were found to exist because the park exists in a large metropolitan area with a complex and dynamic economic base, and implementation of any of the alternatives would have little influence in the overall economy of the metropolitan area.

What groups did you consider? First, Chinatown is a minority community. Second, as 70% of our residents are categorized in the low-income bracket, Chinatown is an ethnic low-income neighborhood. We conclude that the Draft EIS failed to include and consider the impact of the proposed project on the Chinatown community in this study.

Since the 1950's with the Independence Mall's conception, our community has been adversely impacted by all the major urban renewal projects in this area. We have been a construction site for close to 40 years. Our community is deeply concerned with what additional impact this project will cause. Therefore, PCDC urges the National Parks Service to address all of the above issues.

Sincerely,


Cecilia Moy Yep
Executive Director


cc: Congressman Thomas Foglietta
Senator Rick Santorum

RESPONSES

3

I hope that our meeting with your board and this letter have begun to allay your concerns. Please do not hesitate to contact me if you would like any additional information, or to talk over any issues that may arise.

Sincerely,


Martha B. Atkins
Superintendent

COMMENTS

PHILADELPHIA COMMITTEE OF THE GARDEN CLUB OF AMERICA

FOUR COUNTIES GARDEN CLUB
THE GARDENERS
THE GARDEN CLUB OF PHILADELPHIA

THE GARDEN WORKERS
HUNTINGDON VALLEY GARDEN CLUB
THE PLANTERS
PROVIDENCE GARDEN CLUB OF PENNSYLVANIA

THE WELDERS
WEST CHESTER GARDEN CLUB
WISSAHICKON GARDEN CLUB

November 8, 1995

Superintendent Martha Aikens
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

Dear Superintendent Aikens,

I am writing in response to your request for comments on the proposed General Management Plan; and more specifically as it affects The Magnolia Garden. As you are aware, The Magnolia Garden was presented by The Garden Club of America to Independence National Historical Park in 1959. The idea was conceived in 1949 by Mrs. Frederick Rosengarten and her sister Mrs. Charles Platt and it took ten years to design, plan and execute. In the early eighties the garden was found to be waist deep in thistles, terribly overgrown, and a cracked pool around the fountain with the original lead figurine was missing. Since then under the auspices of the Philadelphia Committee of The Garden Club of America - comprised of ten G.C.A. Garden Clubs in the Philadelphia area - work days have been scheduled in The Magnolia Garden. In the past few years, due to the destructive impact on the garden from St. Mary's School children, we are once again working hard in close cooperation with the Park Maintenance people to return The Magnolia Garden to its original beauty.

We were distressed to read in The Management Plan of the possibility of removing the fountain (P.48) and redesigning the garden (P.100). On P.57 it is stated "Partners would be sought to improve some of the gardens." At this very moment we are in the process of restoring the fountain and adding plant material at a cost of thousands of dollars. The fountain will have a recirculating pump which will greatly reduce the cost of upkeep to the park. It is imperative that we have your commitment to keeping the fountain and present garden design as we go forward with this project. In turn you have our longstanding and active role in maintaining this gem in the park.

Our goal, as we work together with Gedge Martin and Steve Murphy is to have The Magnolia Tribute Garden in near perfect condition by the Spring of 1997, when the Annual Meeting of The Garden Club of America will bring hundreds of women - conservation and preservation leaders - from all over the country to Philadelphia. They, of course, will be interested in visiting The Magnolia Garden and Independence National Historical Park.

NOV 13 1995



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311 S. 15th Street
Philadelphia, PA 19106

BY AIR MAIL

NOV 22 1995

H30 (INDE)

Jean Bodine and Keith Straw,
Co-Chairs, The Magnolia Tribute Garden
Philadelphia Committee of
The Garden Club of America
401 Cypress Street
Philadelphia, PA 19106

Dear Mrs. Bodine and Mr. Straw:

I am in receipt of your November 8 letter regarding the park's draft General Management Plan now in circulation and of your note to Doris Panelli.

Speaking on behalf of the park, Dr. Panelli assured you by telephone that your concerns regarding the plan's discussion of the Magnolia Garden were editorial oversights that should have been removed from this draft. We have listed the public comment for correction in the present draft for which the public comment period ends November 20. The National Park Service values its long-standing partnership with the Garden Club of America and we have every intention of continuing this relationship through our operation of the Magnolia Garden. We are very appreciative of the Garden Club of America's efforts to raise funds to restore the fountain and to add plant materials in the Magnolia Garden. This long-standing partnership will be acknowledged in the General Management Plan.

In order to keep accurate records of the planning process, I am sending a copy of your letter and note to Beidre Gibson who is coordinating the public comment process for the National Park Service.

We look forward to working with you in preparing the Magnolia Garden for the 1997 Garden Club of America Annual Meeting, and to continuing our relationship into the next century.

RESPONSES

RESPONSES

COMMENTS

PHILADELPHIA COMMITTEE OF THE GARDEN CLUB OF AMERICA

FOUR COUNTIES GARDEN CLUB
THE GARDENERS
THE GARDEN CLUB OF PHILADELPHIA
THE GARDEN WORKERS
HUNTINGDON VALLEY GARDEN CLUB
THE PLANTERS
PROVIDENCE GARDEN CLUB OF PENNSYLVANIA
THE WEEDERS
WEST CHESTER GARDEN CLUB
WISSAHICKON GARDEN CLUB

We look forward to your response.

Sincerely,

Jean Bodine

Jean Bodine and Keith Straw
Co-Chairs The Magnolia Tribute Garden

2

Thank you for your continued interest in Independence National Historical Park and for your valued support of our efforts.

Sincerely,

Martha B. Atkins

Martha B. Atkins
Superintendent
Independence National Historical Park

RESPONSES

FAX FORM

It is my hope that a fax of these comments will meet your deadline. A hard copy will be mailed out this evening.

A cooperative project of: American Friends Service Committee • Central Philadelphia Monthly Meeting • Friends Council on Education
Friends General Conference • Friend Journal • Friends World Committee for Consultation (Section of the Americas) • Pendle Hill
Philadelphia Yearly Meeting • American Unitarian Society • Friends Association for Higher Education • Friends Committee on National Legislation
Friends Hospital • Friends' Services for the Aging • George Fox College • Guilford College • Jeanes Hospital
Quaker University Fellowship • William Penn College



NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

PLEASE REPLY BY POST TO:

018 (IMPZ)

January 22, 1996

Mr. Harris Eckstut
Clerk, Historic District Task Group
Philadelphia Yearly Meeting, Religious Society of Friends
1515 Cherry Street
Philadelphia, Pennsylvania 19102

Dear Mr. Eckstut:

Thank you for your letter describing the Task Group's response to the General Management Plan for Independence National Historical Park. I appreciate the time and thought your group has contributed to studying the proposals set forth in the plan.

We generally concur with the principles described in your letter. I will note, however, that in redeveloping Independence Mall we seek neither to maintain a sense of historic Philadelphia - an ambition that simply is not possible given the size and setting of the mall - nor the ambience of a twentieth century theme park - obviously a contradiction to the mission and purpose of a national historical park.

The Quaker contribution to shaping the intellectual and political climate of early Philadelphia is undisputed and will continue to be an important contextual backdrop for many of the events and theses interpreted in the park. We look forward to working with you as we develop a renewed interpretive program for the park and in particular as we review the existing interpretive program at the Free Quaker Meeting House.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

COMMENTS

RESPONSES

Philadelphia yearly meeting

religious society of friends

1515 Cherry Street, Philadelphia, PA 19102 (215) 241-3644

November 20, 1995

Martha Aikens, Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

Dear Martha Aikens,

At its regular session of May 25, 1995, the Representative Meeting of Philadelphia Yearly Meeting of the Religious Society of Friends (Quakers) approved the formation of a Philadelphia Historic District Task Group "to ensure the involvement of Quakers, in an organized fashion, in the various initiatives being mounted in Philadelphia and the region to improve and expand the quality, quantity, and accessibility of historic information, projects, and sites." This action recognized both the historic role of Quakers in the city, state, and country and our present status, through our Meeting House at Fourth and Arch Street, as part of the Historic District of Philadelphia.

The Task Group has been considering the variety of proposals put forth over the past three years. In particular, we have studied the Draft General Management Plan and other documents relating to the further development of Independence National Historical Park. We have been pleased to note the Park's commitment to work in partnership with community organizations which share its vision and mission. In the spirit of such partnership, we now share with you the following basic principles on which we have reached unity and which will guide our discussions with all entities engaged in tourist and historical development and interpretation:

- 1) Looking at the Park as a whole, we would prefer to see a limited use of resources to provide interpretation and accessibility to the very rich range of historical resources already existing in Philadelphia. Maintenance of historical integrity should be a first priority in any physical development of Independence National Historical Park or other sites in the Historic District. New institutions such as museums, institutes, and information centers should be founded only in response to a genuine need and should not be at the cost of those well-established bodies now struggling to survive. Where possible, existing structures should be used before spending large amounts on new construction. Development of the Mall should seek to maintain a sense of Philadelphia in the late eighteenth century, not the ambience of a twentieth-century theme park.
- 2) Quakers have played an important role in city, state, and national history, and their story should be an essential part of any interpretation of Philadelphia and national history. This is especially true of any site emphasizing seventeenth and eighteenth-century Philadelphia and U.S. history. We believe

RESPONSES

COMMENTS

that any accounts of "the founding of the nation from 1775 to 1800" which do not provide thorough information about pre-Revolutionary Philadelphia and Pennsylvania -- a period abounding in Quaker history -- fail, by omission, to explain the fertile intellectual and political soil upon which ideas of Independence could flourish.

3) The interpretation of the sites should maintain historical integrity without placing either a twentieth-century cast on the eighteenth century or an eighteenth-century hue on the twentieth. We are anxious that the Quaker story which is told be truthful, neither romanticizing nor ignoring the Quaker role in the past. The presentation of the past should not imply that Quakers are extinct. We are prepared to work with others to interpret the role of Friends in American history as part of an integrated story with broad public appeal.

4) We suggest that the Free Quaker Meeting House would be an ideal site for the accurate interpretation of Quaker history in this region. We have long been concerned that the interpretation of the Free Quakers, a minor offshoot of Quakerism which did not long survive the Revolution, has given a distorted emphasis to their role in local, regional, or national history. The building, however, is a typical meetinghouse and would provide an ideal site for the interpretation of the role of all Quakers in the aspects of history emphasized by the Independence National Historic Park. For those with further interest in information about Quakers and Quakerism, the meeting house at Fourth and Arch Streets would continue to be open to the public. They could also be referred to the Quaker Information Center at 15th and Cherry Streets. Once again, Friends would expect to work closely with any groups responsible for developing the Free Quaker site, to ensure accuracy in historical interpretation.

As one of Philadelphia's oldest communities and as close neighbors to the Independence National Historical Park, we Quakers look forward to working with you and your staff to find new ways that will make the past, including the Quaker heritage of this area, more accessible to present visitors to Philadelphia.

Sincerely,

Harris Eckstut pm

Harris Eckstut
Clerk
PYM Philadelphia Historic
District Task Group

cc: Martha Bryans, Clerk, Philadelphia Yearly Meeting
John Caughey, Clerk, PYM Representative Meeting
Nancy Middleton, General Secretary, PYM
Karen Butler, Historic Philadelphia, Inc.

RESPONSES

COMMENTS

PHILADELPHIA HISTORIC DISTRICT TASK GROUP

Composition	
ORGANIZATION REPRESENTED	REPRESENTATIVE
Arch Street Meeting House	Sandy Sudofsky
Friends Historical Society and Quaker Collection, Haverford College	Emma Lapsansky
Friends Historical Library, Swarthmore College	Mary Ellen Chijioke
Monthly Meeting of Friends/Philadelphia	Carol Spawn
Phila. Quarterly Meeting	Joyce Halley Bill Kashatus
PYM Arch Street Property Committee	George Batcheler
PYM Outreach Committee	Harris Eckstut
Quaker Information Center Oversight Committee	Margaret Hope Bacon
	Elizabeth Foley
	John Gallery
	Prudence Churchill
	Sarah Brooner
Mennonite; Centipede tour guide; former clerk of Wm Penn Tour booklet cntr.	
	Edwin Bronner
	Jerry Frost
	Selden Smith
	Signe Wilkinson
willing to do drawings	
	Edwin Bronner
	Jerry Frost
	Selden Smith
	Signe Wilkinson
ex-officio -- to receive mailings	Peggy Morscheck Quaker Info Center
	Sally Rickerman
	Central Phila.
	Mill Creek

10/23/95

 CANNOT BE ON TASK GROUP, BUT WILLING TO CONSULT ON AD HOC BASIS

COMMENTS



Mr. Martha Allen, Superintendent
Independence National Historic Park
313 Walnut St.
Philadelphia, PA 19106

October 11, 1993

Exposed General Management Plan

Dear Ms. Allen:

I write this letter as a comment and objection to the portions of the proposed General Management Plan which calls for the closing of Chestnut Street between 5th and 6th Streets.

If that feature of the Plan is adopted, without any alternative routing of traffic, all the traffic which now uses Chestnut Street between 5th and 6th Streets would have to turn south on 6th Street, and east on Pine Street to replace Chestnut Street at 5th. This would involve additional traffic in a widely residential block which is already overburdened with traffic much of the time.

I must therefore advise you that the Civic Association will almost certainly oppose the closing of Chestnut Street without assurances that the foreclosed traffic will not turn south into the residential portions of Society Hill. We will take this matter up formally on October 18, 1993, but you can register this letter as an objection to that feature of the Plan.

I have a suggestion for your consideration: Reroute the traffic over Market Street, by making 6th Street a two-way street between Chestnut and Market streets, and forbidding right turns on to 6th from Chestnut. I believe 6th Street is wide enough to accept the additional traffic. If not, the street could be widened, with the only lost being a small strip of land which is part of the Park, thus not affecting homeowners or commercial enterprises.

I hope that you can give assurances that the Chestnut Street traffic will not be permitted into Society Hill and that we can therefore withdraw this objection, and I look forward to hearing from you to that effect.

With best personal regards,

Very truly yours,
Martha J. Buckman
Martha J. Buckman
President

Box 3 • Philadelphia, Pennsylvania 19105 • 215-629-1288

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

January 22, 1996

D18 (INDE)

Mr. Melvin J. Buckman
President
Society Hill Civic Association
Box 3
Philadelphia, Pennsylvania 19105

Dear Mr. Buckman:

Thank you for your letters of October 11 and 25 regarding the General Management Plan for Independence National Historical Park. I appreciate the Association's concern over the potential impact to Society Hill of the proposed closing of the 500 block of Chestnut Street.

We will work with the City of Philadelphia to further study the impacts and possible solutions, including the solution you have suggested. As you may realize, a final decision on this proposal is the responsibility of the city, and not of the National Park Service. While my first responsibility is the safety of visitors and the protection of the park's fragile historic resources, the park will continue to be a good neighbor.

I am grateful for the Association's ongoing support and interest in the park and will work with you to resolve this concern.

Sincerely,

Barbara Kaplan
Barbara Kaplan
Superintendent

cc: Barbara Kaplan, Philadelphia City Planning Commission

70000



Proposed General Management Plan

[illegible]

Box 3 • Philadelphia, Pennsylvania 19105 • 215-629-1288

COMMENTS

THE BOURSE - SUITE 400
111 S. INDEPENDENCE MALL E
PHILADELPHIA, PA 19106
TEL: 215/923.0004
FAX: 215/923.1749

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November 20, 1995
NATIONAL
CONSTITUTION
CENTER

Ms. Martha Aikens and Ms. Marie Rust
National Park Service
Philadelphia, PA

Dear Martha and Marie:

We would like to formally comment on the NPS General Management Plan draft proposal. We appreciate the opportunities we have had to make our views known informally through constructive and frequent meetings with the leadership of the Park and the Regional Office. We have also made formal statements at the time the plan was announced and at public hearings throughout the process. We attach those statements for inclusion. We appreciate the fact that we have been designated in the Draft GMP to construct a facility on the third block of Independence Mall and to participate as partners with the NPS, the City of Philadelphia, the Pew Foundation and the Friends of Independence Park and the State to help turn the Mall into a great public space that celebrates the pathbreaking democracy which was created in Independence Hall.

Substance

There is general agreement that the Mall needs to become a great magnet, a great public space that celebrates the ideas and vitality of our country. The Pew Foundation's willingness to fund a new Visitor's Center, that will be a gateway to the region is a very positive and robust beginning. If the Mall is to work as a place that the public is drawn to year around, it must have a variety of activities and be a place of dignified and substantive attractions. But this must not rule out the practical aspects of life that the Philadelphia ALA Chapter has noted in its important statement on the Mall's development (May 10, 1995).

Food and restaurants are possible uses of the Mall, not just in the Visitor's Center and in The Constitution Center. If a plan like that presented by Stanley Runyan is ultimately adopted, which features an inward-looking Mall, with pedestrian streets running through it, it can be similar to Locust Walk at the University of Pennsylvania. Doing so can create a colonial scale experience on the site. We believe it essential that world renowned thinkers from a variety of disciplines come together and discuss the possibilities of this enormous space, in the heart of a great city.

We are concerned that the draft GMP contains a multitude of activities that are specifically placed on the Mall by bubble diagrams. We think the master planners of the Mall need to be able to think and employ their expertise and imagination without

A copy of the official registration and financial information of the National Constitution Center may be obtained from the Pennsylvania Department of State by calling toll free, within Pennsylvania, 1(800) 732-0999. Registration does not imply endorsement.



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311 S. Walnut Street
Philadelphia, PA 19106

IN REPLY, PLEASE TO:

D18 (INDE)

January 22, 1996

Mr. Robert Brasler
Mr. Stuart Feldman
National Constitution Center
Suite 560, The Bourse
111 South Fifth Street
Philadelphia, Pennsylvania 19106

Dear Bob and Stuart:

Thank you for your letter summarizing your thoughts on the General Management Plan (GMP). While it will not be possible to publish the nineteen pages of enclosures in the Final Environmental Impact Statement, please know that we have read and considered all suggestions made by your organization.

The broad guidelines provided by the GMP are neither premature nor restrictive. They are the product of over two years of study and discussion that involved many professionals and hundreds of citizens. They will serve to protect the priceless historic resources of the park, enhance interpretation of the park's themes, and those expressed by related cultural institutions and sites, strengthen relationships between the park and the community, and meet the interests of all parties to the extent that is feasible. The reasoning that has led to decisions regarding locations of various functions within the park is sound and will direct any future design process, although minor modifications may be the outcome of detailed design.

I agree with you that some activities on Independence Mall can and should be combined. This is why a constitution memorial will be incorporated into Constitution Plaza. The plaza itself will be one of the most important symbolic and functional spaces in the park. For over two centuries, the area that is now the park has been a site for citizens to exercise their first amendment rights, and we believe that participating in or witnessing the expression of those rights are valuable and thought-provoking experiences both for the demonstrators and for our visitors. Large and/or noisy events have the potential to disrupt the enjoyment of visitors, however, and that is why the proposed plan would locate such events in Constitution Plaza, a specially designed and receptive space beyond the historic core of the park. Participants in these events would still be within sight of the Liberty Bell and Independence

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Ms. Aikens and Ms. Rust
November 20, 1995
Page 2

these restrictive and premature guidelines. We also think that some of the activities can be combined. For example, the suggestion for a Constitution Memorial is one that can be contained within the Constitution Center, or incorporated into the design of its building.

The Constitution Plaza described as the site for demonstrations and festivals is another element that gives us pause. Given the rarity of use of the existing space for such purposes, we would hope that any frontage on Market Street must contain elements that would attract people into the interior of the second and third blocks of the Mall and not repeat the vacant barrier to the North that now exists. Spaces set aside for demonstrations and festivals should include moveable elements, such as the attractive tables and chairs and kiosks used in Bryant Park in New York City, which illustrate what clear and visionary thinking can do to create great and flexible public spaces.

This vast vacant space and what it should become has been eloquently described by one of America's leading architect's and Philadelphia native Joseph Esherick, who wrote a letter June 2, 1994, to the NPS, that he kindly shared with us. We attach Esherick's letter, which we think is still apt.

On behalf of the NCC, we are delighted to be designated in the plan to be given the right to create a fine building in which we will tell the story of the compelling ideas of the Constitution and the thoughts on which it rests, as they affect us everyday. The flyer that was passed out by National Park Service on August 9th, stated that the Center would tell the story of how the Constitution "shaped the path of the nation since 1800." We will necessarily have to tell prior history in order to do that. For, as Stuart Feldman wrote in his December 1984 paper proposing this idea, the Constitution rests on a galaxy of ideas originating with the Greeks, developed in England from the Magna Carta, and, in practice in the American Colonies, until the American Revolution, and in the Enlightenment. We are also attaching to this letter our basic themes document which we have discussed with the NPS, that explains the emphasis of the Center on the great ideas and concepts that flowed from both the Constitution, and Declaration of Independence.

One of our principal concerns with the GMP is whether the flow of visitors will be a coherent one that will lead the great mass of visitors to the Park to the Center. We are concerned that, if we are located in the northern block, that visitors will proceed from the Visitors Center directly to the Liberty Bell and Independence Hall, and then return to their buses, without visiting The Constitution Center. Designers of shopping malls, theme parks and other public attractions have studied, and are particularly concerned with pedestrians, traffic patterns of customers and visitors.

We are also concerned that people going to the Liberty Bell and Independence Hall will gain the most from those visits if they have first been to the Constitution Center and been steeped in the subject, which too many people learn too little about in school. Indeed the recent survey reported in the Washington Post showed how little students learn about history. The primary goal of the Center, authorized by Congress, is to reach the general public and their children, rather than the more sophisticated audiences that have completed college and graduate school.

Hall, and day-to-day visitors would have the choice to view and participate in the events or not. We believe that this is a good and even exciting solution that will protect the interests of all citizens as well as the integrity of the historic resources.

Indeed it is important that Constitution Plaza incorporate elements that are attractive and useful on an every-day basis, and that is an issue that will be addressed by a future design process.

I do not share your conclusion that visitors will neglect to visit the Constitution Center unless it is situated directly in their path. Comparison of the dynamics of Independence Mall to those of a shopping mall ignores the reality of an urban historic district with many entrances, circulation systems, pathways, and fine resources and attractions. The preferred alternative is based on our experience in over 300 units of the National Park System: most visitors will arrive at the proposed visitor center, become oriented and excited about the remarkable number of possibilities the city holds, and make their own informed choices about itineraries. While it is possible that specific visitor flows can be programmed into interior spaces, such as museums, we reject the notion that people can be choreographed in a setting as large, rich and diverse as a city.

Because you project that visitors will make a time commitment of several hours to the Constitution Center, it follows that visits cannot and will not be spontaneous, but rather, the product of informed decisions made by visitors well before they reach Philadelphia. The location of the Constitution Center relative to Independence Hall and the Liberty Bell is less important than the ability of Constitution Center programs to attract people.

You are quite right that the proposed visitor center will not be a national destination, nor is it intended to be a dominant attraction. The historic resources of the park are the destinations, and we hope that the Constitution Center one day also will be recognized nationally and internationally. A visitor center simply serves people so that they can move on to what they came to see and do.

We agree with the studies that find that visitors to Philadelphia spend only two to three hours here. The citation of two to three days was an editorial error. None of our projections were based on the larger figure.

We agree that the institutional and office buildings that surround the mall contribute to its isolation. We encourage you,

COMMENTS



Ms. Aikens and Ms. Rust
November 20, 1995
Page 3

The Visitors Center — We recognize the importance of the proposed Visitors Center in creating a "gateway" to the Park, city, and region. However, a Visitor Center is not a national destination, nor does it provide the space in which to tell the important story visitors should get before confronting our great historic icons. If it becomes the dominant attraction on the second block, and introduces the entire region to visitors, it will be important. But it will not be the national destination that will attract millions of additional visitors to the Park. We are particularly concerned that questions of visitor flow be examined in relation to all the designated buildings.

Buses and Parking — William Roberts of Wallace Roberts and Todd, the land use planning firm, has wisely suggested that the arrival point be located on Sixth street thereby minimizing the imposition of traffic and especially buses on the Mall itself and the axis which controls the view of the Hall. We agree and encourage a plan that intercepts the visitors' buses and cars at the north point of activity to eliminate this traffic as quickly as possible and leads the visitor South through the Visitor Center, the Constitution Center, Liberty Bell Pavilion and Independence Hall.

Economic Assumptions in GMP — The GMP states that visitors to Philadelphia now spend two to three days. This contradicts information in other studies which have found that people only spend an average of two to three hours. Ernie Leonardo, a principal author of "Destination Philadelphia", cited in the GMP, says that it did no research to support the 2-3 day finding. The statement thus confuses and minimizes the gains that come from Plan F. This is particularly the case with hundreds of thousands of visitors who come on tour buses to the Park, and stay only long enough to see the Liberty Bell, and Independence Hall, and, perhaps, eat in the Bourse Building. The Pennsylvania Convention and Visitors Bureau supports the 2 - 3 hour statistic.

The Edges — The buildings that surround Independence Mall, especially the federal buildings, should be considered in part of the overall strategy for the Mall. The GSA which oversees those buildings should be invited to participate, for its buildings contain no stores or restaurants that will attract visitors, or the people that work in the buildings and area, to stay on the Mall in the evening. Additions and modifications that add stores, restaurants and theaters should make the entire Mall more lively.

Process

A systematic planning process that involves the best thinkers available to help create a public space fitting the importance of the birthplace of American and modern popular democracy is needed. There are great minds across the nation that could be rapidly assembled to examine the possibilities. Jane Jacobs, Vincent Scully, William Whyte, James Rouse, Ada Louise Huxtable and their current day successors, like Willard Rouse, Paul Goldberger of the NY Times, and others, who have given the workings of cities great thought and creativity, should participate. Philadelphians, including people with an understanding of commercial development principles, as well as, architects, urban and landscape planners, city planners and pedestrian traffic and transportation analysts, theme park and other public attraction planners, need to be drawn on.

RESPONSES

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responsible officials, and others who are interested to work with adjacent landowners on development that could enliven the neighborhood.

We thank you for your interest in Independence National Historical Park.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent
Independence National
Historical Park

RESPONSES

COMMENTS



Ms. Aikens and Ms. Rust
November 20, 1995
Page 4

The NCC would like to participate in a process that provides for regular meetings of all the partners to discuss the work as it develops.

We make these suggestions recognizing the needs of the Pew Foundation to open its building in 1998. We, too, feel the sense of urgency. We want to open the Constitution Center one year later in 1999, as America's celebration of the Millennium: one that helps us understand the significance of democracy in the governance of an ever growing world population, as well as, educates and stimulates citizenship at home. The striving for democracy of peoples in South Africa, Eastern Europe, and, in China, illustrate the importance of our task. The polls, describing our own citizens' ignorance of America's core ideas, are another great reason to move this process ahead aggressively. We look forward to working with our partners to achieving the end we all desire--a great Mall, with institutions, buildings, and lively, welcoming, and useable public spaces we can all take pride in.

Sincerely yours,

Stuart
Stuart F. Feldman

Robert M. Brasler
Robert M. Brasler

RESPONSES

COMMENTS

1. REMARKS BY A. E. WOLF, CHAIRMAN OF THE BOARD
NATIONAL CONSTITUTION CENTER AT THE PUBLIC ANNOUNCEMENT
OF THE GENERAL MANAGEMENT PLAN FOR
INDEPENDENCE NATIONAL HISTORIC PARK - AUGUST 9, 1993

"WE THE PEOPLE OF THE UNITED STATES, IN ORDER
TO FORM A MORE PERFECT UNION, ESTABLISH JUSTICE,
INSURE DOMESTIC TRANQUILITY, PROVIDE FOR THE
COMMON DEFENSE, PROMOTE THE GENERAL WELFARE,
AND SECURE THE BLESSINGS OF LIBERTY TO
OURSELVES AND OUR POSTERITY, DO ORDAIN AND
ESTABLISH THIS CONSTITUTION FOR THE UNITED
STATES OF AMERICA."

THESE BRILLIANT AND INSPIRING WORDS COMPRISE
THE PREAMBLE OF OUR CONSTITUTION, THE GREATEST
POLITICAL DOCUMENT EVER WRITTEN.

THEY ORIGINATED RIGHT HERE, IN INDEPENDENCE
HALL, A PRODUCT OF THE PHILADELPHIA CONVENTION
DURING THE SUMMER OF 1787, LED BY GEORGE

RESPONSES

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WASHINGTON AND BENJAMIN FRANKLIN, WITH 53
OTHER DELEGATES FROM THE 13 COLONIES.

THAT WAS 208 YEARS AGO.

50 YEARS AGO THIS VERY DAY, A HORRIFIC
MILITARY EVENT TOOK PLACE IN NAGASAKI, JAPAN.

IT WAS MEANT TO END A TERRIBLE WAR AND
PRESERVE THE WORLD FOR DEMOCRACY.

IT DID AND THE WAR.

BUT NO MILITARY EVENT CAN PRESERVE
DEMOCRACY.

ONLY AN INFORMED CITIZENRY HAS, WITHIN ITSELF,
THE POWER TO DO THAT.

WE OF THE NATIONAL CONSTITUTION CENTER,
PRIVATE CITIZENS ALL, "WE THE PEOPLE", ARE
THRILLED AND PROUD TO BE WORKING WITH THE

RESPONSES

COMMENTS

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NATIONAL PARK SERVICE, INDEPENDENCE NATIONAL HISTORIC PARK, AND THE FEDERAL, STATE, AND CITY GOVERNMENTS. TOGETHER WE WILL CREATE, RIGHT HERE ON THIS INDEPENDENCE MALL, A FACILITY, A CONSTITUTION CENTER, THROUGH WHICH EVERY CITIZEN, YOUNG AND OLD, WILL BE ENCOURAGED AND ENABLED TO ENGAGE THEIR CONSTITUTION IN ORDER THAT THEY MAY BETTER APPRECIATE, UNDERSTAND, AND PARTICIPATE IN THE AMAZING PHENOMENON OF CONSTITUTIONAL DEMOCRACY.

THANK YOU FOR THE OPPORTUNITY!

RESPONSES

COMMENTS



**How to Capitalize on Philadelphia's History to Gain
Preeminence in the World's Largest Industry -- Tourism**

By: Stuart F. Feldman
November 20, 1995

National Constitution Center • Suite 500 • 111 S. Independence Mall E • Philadelphia • PA 19106 • 215-922-0004 • FAX 215-922-1749

COMMENTS

RESPONSES

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November 20, 1995

How to Capitalize on Philadelphia's History to Gain Preeminence in the World's Largest Industry - Tourism

America's most historic square mile is in Philadelphia. It is not the tourist magnet it should be. On the very streets that we walk daily, stand buildings in which events that shaped America and the world took place. Under Mayor Rendell's leadership we are trying to improve the use of those resources to attract millions of people to visit our city for lessons in history and liberty. We must act now to create a critical mass of attractions, that will keep people in the Philadelphia region for two to three days, instead of two to three hours. Philadelphia should be the capital of America's history.

Many cities have sites significant for history or architecture. What is unique about Philadelphia is that the broad story of America from the colonies to the Civil War can be discovered within a few square blocks. No other city has this potential.

We must capitalize on the entire geographical area. The first and foremost step to make the Philadelphia experience compelling is to turn the now largely deserted second and third blocks of Independence Mall into a great public space. The Pew Foundation has generously proposed funding for a new regional Visitor's Center, which will be the "gateway" to the entire Philadelphia region.

The National Park Service in August 1995 recommended giving the National Constitution Center, founded in 1986 for the purpose of educating Americans about the Constitution, the opportunity to build a new kind of museum-- The Constitution Center on the third block of Independence Mall. It will explain the great ideas of the Constitution and Declaration of Independence to visitors to the Liberty Bell and Independence Hall. In so doing, the Center will engage visitors and their children with the concepts of democracy and make them see how they affect our daily lives. When the Constitution Center does that, it will make vivid the story of America's greatest export -- the Constitution.

The area this paper focuses on runs from 7th Street to the River and from Lombard to Race Streets. One crucial step is to lift the face of Market Street, east of the Park Service's Benjamin Franklin Museum, to work with store owners to improve the storefronts, and fill in the few gaping holes, where there once were buildings, with visually complementary structures. If we do this, we will change what is now a repelling, depressing scene, into a vital street, whose buildings are, even now, when looked at closely, similar in design to those on Washington D.C.'s Georgetown's lively main thoroughfare, "M" Street and Wisconsin Avenue. We will thereby turn a barrier into an asset, and profit from the major improvements to Market Street's sidewalks and streets, now well advanced.

That improvement will open up Old City north of Market Street to the kind of development that tourists and residents love, like that in New York's Soho, Tribeca and other east iron districts. For Old City's building and streets also have that great potential if more people will cross Market Street and go to them. Stores, restaurants and real history

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can keep and hold visitors, just as Disney World mixes its attractions with frequent chances to eat and shop.

In Old City, we can blend history with the life of a vital neighborhood by, for example, telling the story of William Penn's greatness and influence. (Voltaire said Pennsylvania was the closest thing to Utopia the world had ever seen), and that of the Quakers, as a group, in under-utilized buildings near the Friend's Meetinghouse. The Quakers started America's first Abolition Movement. Quaker women led the Women's Suffrage Movement.

Across from Christ Church, we can tell the story of religious freedom in America in another empty building. And then have people go on to visit the first African American Congregation, Mother Bethel Church at Lombard Street. A mixture of films, artifacts, live actors, and computerized exhibits will bring history to life in each of the locations described here.

Opportunities must also be provided for now in the Park Service's once every 20-25 year General Management Plan for Independence National Historical Park. Future developments which can augment the ambitious undertakings on the Mall must be allowed to start as soon as money can be obtained. The principal buildings that are pivotal are; the First and Second Banks of the U. S.; the Merchants Exchange; and the current Visitor's Center. Significant parts of The Philadelphia Story should be told in each building, as well as, in buildings beyond the Park. Mayor Rendell's Historic Philadelphia organization, by putting on the streets, short period plays and town criers in the Park, in conjunction with the Park Service, has already sparked an enthusiastic response in visitors. Edmund Bacon's wonderful ideas for sound and light shows will extend the wonder into the evening.

The First Bank, as the Park Service has already proposed in its plan, will contain exhibits on Alexander Hamilton's use of that institution in his plans that set commercial strategy for America's development. Stephen Girard, a Philadelphia merchant, bought the building in 1811 after the First Bank failed. Girard was tremendously successful. He bequeathed his vast fortune to benefit the city (it still does, through the Board of City Trusts), including creating Girard College. Girard's story is relevant today, for in the 1960's a successful desegregation suit forced open the school that Girard's will reserved for "white male orphans".

The Second Bank should house a detailed and dramatic exhibit telling of the great struggle between President Andrew Jackson and Nicholas Biddle over the life of the powerful Bank, headquartered there. The Bank's strength rivaled that of the Federal Reserve; Nicholas Biddle was the Allan Greenspan of 1830. Jackson humbled the Eastern Establishment, vastly expanding the power of the presidency, and the people. We can also tell there, the story of the banking industry and finance's role in making America a great economic power.

Two other options need to be in the Park's plans. One is to turn the main space of the Mercantile Exchange Building into a great public space, including a restored Grand Trade Room, where visitors could come and learn about the flowering of America's business

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November 20, 1995

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COMMENTS

culture, heavily influenced by the publication in 1776 of Adams Smith's *Wealth of Nations*. Under the current plan, the building would again house Park Service offices. Yet this building, too, was a formative structure in America's history, for it was there that merchants exchanged goods that helped open the West.

The current Visitor's Center is another key structure: the Park Service intends to use it, in part, to display its architectural artifacts. If that plan could be expanded, to include the capacity to explain to visitors what makes Philadelphia's collection of wonderful buildings so fabulous -- look at the details, and what makes cities work, it would add another major piece in a wonderful series of activities for residents and tourists.

More visitors would go the Balch Institute and learn about immigration and industrialization. And visit the Awater Kent, or the new Philadelphia History Museum, when it is built, to discover this great city's past and future -- Philadelphia's first are endless. The African-American Museum is another important stop.

If we plan strategically, we can have a wonderful mix of activities, that tap the burgeoning interest in cultural tourism. The recent White House Conference on Tourism designated it as a high growth arena. On the waterfront, besides the new Maritime Museum, we can create other family destinations, including a theme park to appeal to younger children. We can also link visitors to the Parkway's attractions, including the Please Touch Museum, the Franklin Institute, and the Art Museum, whose collection of colonial furniture, silver and period rooms are all part of a wonderful story that needs to be deepened, connected, packaged and promoted. From there visitors can strike out to Valley Forge and discover the resources of the Brandywine Valley and Northern Delaware.

Philadelphia will benefit, dramatically and more importantly, so will the nation, once we vitalize truly national treasures that now are obscured. A vivid sense of the values of the past can light the way into the future, for the ideas and experiences of the Founding Americans are timeless.

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November 21, 1995

RESPONSES

COMMENTS

The Baronial Order of Magna Charta

G. Tully Vaughan II
Marshall
John Arthur Miller
Keeper of the Signet

Suite K
1530 Locust Street
Philadelphia, PA 19102
(215) 752-1915 - Vox/Fax


10 November 1995

Dear Colleague,

Here is a proposal and comment by the Baronial Order of Magna Charta concerning the National Constitution Center proposed for Independence Mall.

Thank you for your consideration of our ideas.

Sincerely,


G. Tully Vaughan II
Marshall
Baronial Order of Magna Charta

RESPONSES



United States Department of the Interior
NATIONAL PARK SERVICE
Independence National Historical Park
311 S. Walnut Street
Philadelphia, PA 19106

ON BEHALF OF THE

D18 (ENDE)

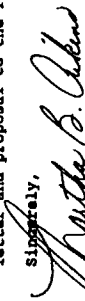
January 22, 1996

G. Tully Vaughan, Marshall
The Baronial Order of the Magna Carta
Suite K
1530 Locust Street
Philadelphia, Pennsylvania 19102

Dear Mr. Vaughan:

Thank you for your letter regarding the role a constitution center might play in interpretation and education about the United States Constitution. Many of the topics you describe will be treated in detail by the proposed Independence Park Institute and the proposed National Constitution Center. I have forwarded copies of your letter and proposal to the respective planners for each facility.

Sincerely,


Martha B. Alkens
Superintendent

COMMENTS

RESPONSES

THE U. S. CONSTITUTIONAL CENTER:

DEDICATED TO THE RULE OF LAW, NOT OF MEN.

In 1215 a coalition of Barons forced King John to accept the Great Charter of Liberties, Magna Carta, which became the basis for our own Declaration of Independence, Constitution and Bill of Rights more than five centuries later. Now the City of Philadelphia is engaged in debate over how best to present those documents and concepts to the world. So far all the proposals presented to the public have lacked a vision of the role of these documents in the history of the rule of law among all nations.

The Baronial Order of Magna Carta, a society of the descendants of the Barons who created and enforced Magna Carta, now presents its vision.

The Constitution and Bill of Rights of the United States of America have demonstrated to the world at large over the past two centuries that a democracy does not have to decay into anarchy, and a republic does not have to devolve into totalitarianism. They do not stand alone and isolated, but are part of a four thousand year struggle to create a society ruled by laws and not by men.

The proposed Constitutional Center on Independence Mall offers the chance to present that grand, four millennia sweep accessible to the vast number of visitors and citizens of Philadelphia, linking it to other sites and institutions in this area that can illuminate that history.

In the Beginning. Where did it all start? In the cradle of civilization: Sumer and the Fertile Crescent. No place else

COMMENTS

RESPONSES

in America is as well suited to explain the 4,000 year old Code of Hammurabi, with its provisions affecting trade disputes, the rights of women and the protection of property or the legacy of Egypt's Book of the Dead, with its judgment of the departed soul against the requirements of Maat - truth and justice. From the great excavations of Ur in the 1920's to the present, the University of Pennsylvania and Princeton University have pioneered the discovery of this history. They can help present that starting point at the Constitution Center and visitors can then go to their fine museums and libraries to learn more.

The Laws of Moses. The Torah, the Mishnah and the Talmud allow us to drink deeply from the earliest wellsprings of law and justice. The Jewish Historical Museum, our synagogues, Princeton Theological Seminary and the other fine seminaries in this area and the Balch Institute for Ethnic Studies can help bring that experience alive for visitors, using reproductions and translations of portions of the Dead Sea Scrolls, Medieval manuscripts of the Torah, movie or photo moments from Bar and Bas Mitzvah celebrations, personal effects of Jewish immigrants to America.

Laws of the Greek Cities. Plato's Republic and its vision of the philosopher-king, the trial of Socrates, the laws and treaties developed by several centuries of struggle for democracy in Greece form a vital link in the chain of progress.

Roman Law. The Code of Justinian, the Law Tablets, and their legacy in Europe and America cannot be minimized. Louisiana

COMMENTS

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has long followed the Napoleonic Code, based squarely on Roman concepts. Pennsylvania courts have looked to Roman law in deciding everything from water rights to punishment for corrupt public officials.

Law in the Dark Ages. From blood-money to ale-feasts, no part of Viking or Anglo-Saxon life escaped the law. How did these violent societies fight crime and revenge? Can their experience help us do the same? The Delaware Valley - home to the oldest Swedish settlements in America and to two centuries of work by the oldest German Society on the continent - is rich in history and resources to explore these issues.

Law in the Colonies. William Penn published the Magna Carta in Philadelphia in 1687, only five years after the city was founded. The world's only complete copy of his book is at Haverford. From the Virginia Charter of 1606 to the Massachusetts Body of Liberties of 1641 to the Constitution Penn wrote for the colony of West New Jersey and his Charters for his own settlement, immigrants were guaranteed that English law back to Magna Carta would follow them to the colonies. When this promise was broken in the next century by the Stamp Acts, denying American colonists jury trials and taxing them without representation, the American Revolution resulted. Today Philadelphia is the center of many heritage societies recognizing the role of our colonial ancestors and honoring those who fought and died in that Revolution, and their long allegiance to the flame of freedom will help us present that history in the Constitution Center. Maps and narratives,

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movies and models, can bring this history alive for visitors and direct them to Valley Forge, Brandywine, Princeton and the many other battle sites and memorials within an easy drive of the city.

From the Declaration of Independence to the Bill of Rights. This is the core of the Center. Interactive displays showing the events of 1776 to 1791, audiotaped extracts from Constitutional debates, movies, exhibits and guides can give meaning to the priceless original documents Philadelphia already possesses that show how the Constitution, the Declaration of Independence (first printed in German!) and Bill of Rights were forged in the heat of debate and compromise.

How has the Constitution's promise been carried out? No place can answer this question better than Philadelphia, the national capitol during the first formative decade. Congress started here, the Supreme Court started here, the President first presided here. Our National Archives branch and historical societies for the Pennsylvania and Federal courts that sit here can illumine this history of justice for the few slowing becoming justice for the many.

Civil War. No Center for the study of our Constitution can be complete without addressing its flaws. The Constitution's compact with slavery contributed to the bloody crisis of the civil war. For those wishing to understand better how the nation went to war with itself, no place is better suited than Philadelphia. With its Civil War Museum and Afro-American Historical and Cultural Museum, the excellent libraries and collections at the Historical

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Society of Pennsylvania and the Union League of Philadelphia, this city is a gold mine of rich resources for the student of the civil war, its causes and its aftermath, who can then move on to Gettysburg and other battle sites with this background.

The Rule of Law in the 21st Century. The story of our Constitution does not end with the events of 1787, or 1865, or the expansion of personal freedoms in the 1960's. It continues today to shape not only our future, but that of the world. As just one example, U. S. Third Circuit Court of Appeals Judge Richard Nygaard of Erie has applied this history in drafting Constitutions and Bills of Rights and Responsibilities for Romania, Albania, Lithuania, Ukraine, Russia, Kazakhstan and Azerbaijan.

The Constitution Center can highlight the contribution of every nation and ethnic group to the development of the rule of law and not of men. The Center can incorporate the wisdom and resources of all the institutions we have mentioned and serve as a nerve center to bring in visitors and Philadelphians alike, let them explore this history, and send them out to these other wonderful museums and galleries and libraries and battlegrounds in a great network of knowledge. Now that is our vision for Philadelphia - guardian and teacher of history.

Total: 1245 words.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY, REFER TO

D18 (INDE)

January 22, 1996

Mr. Stuart Feldman
The National Constitution Center
Suite 560, Bourse
111 South Fifth Street
Philadelphia, Pennsylvania 19106

Dear Stuart:

Thank you for your letter and essays describing your proposals for an approach to integrating many of the historic themes and resources of Philadelphia's historic district. Your ideas are exciting and ambitious.

The General Management Plan is by its nature flexible, and can be understood to allow the implementation of many of your ideas in the future, as long as they are consistent with the park's purpose and can be accommodated under ever present budgetary and staff constraints. The park will do its part, yet an obvious question raised by your essays is what current or future organization might be best equipped to spearhead such an enormous effort.

I encourage you to share these ideas with many others who can be part of discussions on their implementation.

Sincerely,

Barbara B. Alkens
Superintendent

COMMENTS

THE BOURSE - SUITE 560
111 S. INDEPENDENCE MALL E
PHILADELPHIA, PA 19106
TEL: 215.923.0004
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November 20, 1995

Ms. Martha Alkens
Superintendent
Independence National Historic Park
313 Walnut Street
Philadelphia, PA 19107

Dear Ms. Alkens:

This is to formally transmit to you a proposal for a broad approach to some of Independence National Historic Park's resources and those of the nearby historic square mile. I think a unified approach between the Park, the city and nearby institutions, as well as, the general public, could enormously augment the visitor experience at Independence National Historic Park. We would like to request that as much flexibility as possible be built into the GMP, so that more extensive plans, for both Park buildings and non-federal buildings, can be realized when money is available. I would hope that these ideas could be incorporated in the next version of the General Management Plan.

I have spoken informally to members of the Park Service about this, including Deirdre Gibson, David Hollenberg, Dennis Reidenbach, and Russell Smith. I also sent them to Roger Kennedy, who raised related issues on the walkabout, because they helped answer his question about how we could make the most use of the wonderful buildings in the Park, and the history that has taken place within the Park, and outside its grounds, in America's most historic square mile, as "education steps".

Two documents are attached: one emphasizes ideas for linkage between buildings in the Park that might be used to tell great stories that happened in those buildings, or contemporaneously, which affected life in our country. The second paper lays out the broader geographical context for creating a greatly strengthened historical, residential, and commercial district, ranging from Old City to Lombard Street, and on the east from Front to Seventh.

Because the GMP will be in effect for more than ten years, if past history is relevant, it is important to obtain flexibility in the plan for alternative uses of the buildings in the Park, especially if a truly exceptional plan could be funded that could fully capitalize on the resources in the area. Particularly important are the alternatives that could be applied to the First and Second Banks, the Merchants Exchange and the present Visitors Center. The suggestions that would make full

A copy of the official registration and financial information of the National Constitution Center may be obtained from the Pennsylvania Department of State by calling toll free, within Pennsylvania, 1-800-725-0099. Registration does not imply endorsement.

COMMENTS

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Ms. Mauda Atkins
November 21, 1995
Page 2

use of the historic events that occurred there, or were influenced by the institutions that occupied them, are described in the attached papers, which we hope will be given full consideration as the CMP is reviewed.

Many thanks for your cooperation. Obviously we would very much like to discuss these ideas with you.

Sincerely yours,

Stuart F. Feldman
Stuart F. Feldman

SFF/cf
Enclosures

Duplicate letter sent to Ms. Marie Rust.

RESPONSES

COMMENTS



Making Full Use of Philadelphia's History

PHASE II:

A Vision for Independence Park
and Important Nearby Historic Sites
in Old City

By: Stuart F. Feldman
October 24, 1995

National Constitution Center • Suite 500 • 111 S. Independence Mall E. • Philadelphia • PA 19106 • 215-923-0004 • FAX 215-923-1749

COMMENTS

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October 24, 1995

DRAFT

Making Full Use of Philadelphia's History

- A Vision for Independence Park and Important Nearby Historic Sites in Old City**
- The historic area surrounding and including Independence National Historic Park possesses great potential to tell the story of America's development as a nation. Its development can provide the city with the cluster of attractions that will make people want to spend weekends in Philadelphia.

It is important to lay this vision out today, in order to qualify it for the General Management Plan (GMP) being developed for Independence National Historic Park, because some of the National Park Service's historic buildings are included in this overall strategy. A GMP is produced once every 15 to 20 years for a given National Park. The strategy is to cooperate with the many organizations that should be involved to use the wonderful historic buildings, in and near Independence Park, to help tell the great stories of the history that took place in Philadelphia, in their original settings.

According to Mayor Rendell, explaining the story of the Declaration of Independence, the Constitution and the Bill of Rights—as they play out through American history, and affect our lives daily—will make The Constitution Center “the linchpin” of the effort to capitalize on Philadelphia's history. The Center's exhibits will fit the other places described here into the context of the great sweep of American history, by telling the story of America's founding documents and explaining how they affect us today. The broad central themes displayed in the Constitution Center is what will attract visitors from across the nation, who will then see how Philadelphia's stories fit into the “big picture.”

Historic Buildings—The Authentic Setting for History

- We must set forth this concept now, before the buildings in the Park are filled with expensive office installations, and while the General Management Plan is still open for comment. By way of illustration and summary, interactive exhibits, theater and live interpreters could tell, and cover in detail, stories like the following:
- The events that took place in the First and Second Bank of the United States;
- Religious liberty, in a building adjacent to Christ Church;
- The true magnitude of William Penn's accomplishments in a building near the Friends Meeting House;
- The story of America's first Abolition Society, that was begun in Philadelphia, in an expanded African-American Museum, as well as, the story of the struggle for abolition, whose symbol became the Liberty Bell;
- The tales of immigration and industrialization in the Balch Institute of Ethnic Studies, are a key part of the story;
- The Atwater Kent Museum's role in telling the story of Philadelphia could be expanded;

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- The Mercantile Exchange Building could house, as Gerry Cope, the imaginative architect, suggests, a wonderful library open to the public, a reading room and coffee house in beautifully restored main spaces. The story of Adam Smith's *Wealth of Nations* (1776) and a further detailing of the industrial development of the nation could be housed in the rest of the Mercantile Exchange, with the story of the first exchanges told there. Philadelphia's architectural strength can be explained there, too;
- The role of Philadelphia's port explained in the Maritime Museum is important;
- A revitalized NPS Benjamin Franklin Museum is part of another piece in this plan;
- The Portrait Gallery, now in the Second Bank, could be put in the wonderful 1850's PSFS bank building, presently sitting empty at Seventh Street, if it is available. That corner of Washington Square could be brought to life;
- Houses, like the Powel and Hill-Physick Houses, would be part of this total plan;
- The Mother Bethel African Methodist Church, whose site is considered the birth place of the African-American Church, is part of this package. An earlier church there was the site of a stop on the Underground Railroad;
- The art and period furniture etc. in the Philadelphia Museum of Art, and the Pennsylvania Academy's Museum of American Art are also critical resources; and
- The great houses of Germantown, and Fairmount Park, and the Brandywine and Valley Forge areas would also be major segments of Philadelphia's historic attractions presented as a package. (Note this list is illustrative—in the interest of space important sites are not mentioned).
- The University of Pennsylvania's — Furness Library, White Dog Restaurant, Annenberg Theater and dramatic campus are another attraction.

The exciting Sound and Light show, Edmund Bacon has proposed, should be expanded to some of the additional sites described here.

The buildings themselves are an integral part of the stories. A lively and educational exposition of Philadelphia's architectural resources will be a critical tool to help visitors fully savor another of Philadelphia's unrealized assets — its diverse and wonderful buildings. A permanent architectural museum in the Mercantile Exchange Building could cover the city's range of styles, and explain their significance and describe what makes cities work best. People should leave Philadelphia knowing that to look at the details of historic building is to admire the craftsmanship and details that make our buildings special.

A cooperative approach by the City, the National Park Service and the institutions involved is needed to make this effort succeed. We must also have an exhibit, perhaps in the new Visitor's Center, showing the vitality of the Philadelphia region, featuring its colleges and universities and health care industry, including the drug companies and their research activities, among others. Thus, we might include, as one of the key stops, Pennsylvania Hospital's historic buildings, (begun by Benjamin Franklin), discuss Benjamin Rush's pathbreaking work there, and then give visitors the chance to see modern research laboratories in action at Thomas Jefferson University, and the University of Pennsylvania.

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Some Stories Detailed—The First and Second Bank
and William Penn/Quaker Meeting House

The Second Bank of the United States would be used to tell the story of the titanic struggle between Nicholas Biddle, and the supporters of the Second Bank with President Andrew Jackson. Jackson's struggle with Biddle, in the interpretation of many historians, meant that the people (in the form of President Jackson) were placed fully in charge of government, while the Eastern establishment was reduced to scale. The fight was between great personalities over a great principle—an expansion of the power of the people. It was a vast turning point, as was Jackson's election.

Biddle, himself, is a fascinating character, having had a vision that Philadelphia was to be the Athens of America. He tried to realize it. The stories of the supporting cast of characters, including Daniel Webster, Henry Clay, etc., would be told there. The struggle mirrors today's arguments over the role and power of the Federal Reserve Board and its chairman, sometimes described as the second most powerful man in America. It also might be a fitting setting to tell the story of the history of banking, which the banking community might be willing to underwrite.

The First Bank

The First Bank of the United States would be the home of major exhibits on Alexander Hamilton. Michael Lind's fascinating article in *The Wilson Quarterly* (summer of '94) describes him as the architect of modern America, whose ideas have the most pertinence for Eastern Europe and Russia. Hamilton created the First Bank of the United States and laid the foundation for our industrial society. His dramatic story, from teenage, in the British West Indies, to precocious businessman, then Columbia student, to Aide de Camp to Washington, to co-author of *The Federalist Papers*, to Treasury Secretary and, finally his death in a duel at the hands of Aaron Burr, is spectacular.

Additional space in the First Bank might be devoted to the successor occupant Stephen Girard, his life a fascinating rags-to-riches story. The creation of Girard College for orphans in the 1830s, and the lawsuit to desegregate it brings the story to the modern day. The value of Girard's donations to the city was enormous, while the story of his tragic wife adds human interest. We would illustrate the ways that he made his fortune in the wonderful space.

William Penn and the Quakers

There are structures, such as the one at Third and Arch Streets, which is currently bricked-up, that could be used to tell William Penn's saga, that so few fully appreciate. He wrapped an idealist inside a sometimes practical businessman, and acted the skilled negotiator with the Crown to amass a gigantic land grant. Penn was one of the country's first great real estate promoters. Voltaire said that Penn created the closest thing to Utopia the world had seen in Pennsylvania. Montesquieu called him the "greatest law giver since the Greeks." The Quakers set a model for tolerance. They started the abolitionist movement. Quakers were the suffragette leaders who ultimately obtained for women the right to vote.

RESPONSES

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October 24, 1995

Maximizing the Benefits from and Controlling Commercial Development in the Surrounding Area

People in Old City and Society Hill have expressed concern about the consequences of tourism. Commercial development could flow along Market Street from Third to the waterfront. It is important to do this sooner rather than later, for those ugly, empty and off-putting stores and empty lots discourage visitors.

The open spaces that now surround the cold federal buildings that line Independence Mall and their ground floors need development. Perhaps, Strawbridge & Clothier, and John Wanamaker might have small satellite stores, displaying samples of their wares there. Restaurants and stores are needed to bring life to the Mall. Movie theaters and other activities should be placed there. The federal government, amazingly repeated on Independence Mall the same mistakes that it made on both sides of Constitution and Independence Avenues in Washington — leaving no space for retail stores or life in the evening, or during the day in its buildings. It simply lined up one office building after another without attention to its effect on the city.

Chestnut Street should also be revived as part of this plan as part of the commercial space. For example, wonderful buildings from First to Third Street are empty. "Night watchmen" could help make the alleys that run from Market to Chestnut attractive and secure.

Obviously, we have to be concerned about the relative lack of office buildings and hotels to bring large daily volumes of people to this area. The fuller development of these historic assets and restaurants might make more people want to locate offices in the area.

Financing

One way to finance some of these activities would be to use the kind of dramatic backing from Philadelphia's foundations that St. Paul, Minnesota persuaded its foundations to apply (described in the book *Reluctant Government*). That city, under inspired mayoral leadership, was transformed from a moribund to, an again thriving metropolis. Obviously, the off-season is a problem time in which to keep museum-related activities financially alive and healthy. Bed and breakfasts could be expanded. The kind of lively activity that Colonial Williamsburg uses could be applied in Philadelphia. Thanksgiving, Christmas and the winter months are popular times of the year there. People coming to the Convention Center could also be persuaded to extend their stay through the weekend, given these additional year-round attractions in Philadelphia.

Much of the expansion described here would be undertaken in a second-phase of development after The Constitution Center is built. In order to carry these ideas out in the next ten to fifteen years, as they relate to Park properties, they must be part of the Park's proposed plan. If funding can be found sooner, it would be important to take full advantage of the Mercantile Exchange Building, a wonderful building that should be open to the public as soon as possible.

COMMENTS

Another Way to Express the Potential of Philadelphia's History

Philadelphia is blessed with an unparalleled collection of historic buildings. Unfortunately, for too long we have failed to capitalize on the opportunity presented by these buildings to develop captivating and educational visitor experiences. Although Independence Hall and related structures are the heart of the historic district, it is important that we not neglect other buildings—most notably Independence Mall—that are also historic treasures.

Many cities have historically or architecturally significant sites. But what is unique about Philadelphia is that it is possible to tell the broad story of America from colonies to Civil War literally within a few square blocks. No other city has this potential. But to realize it, we need to approach historic sites not (as we currently do) as discrete buildings, per se, but as "touchstones" to access different parts of a cohesive and sweeping story. Such an approach could transform the feel and attractiveness of Philadelphia's historic district, creating a integrated and compelling visitor experience, much like Colonial Williamsburg's, or Washington's.

This paper is an effort to sketch out such approach. It is based on the idea that as Philadelphia was once America's capital, it should now be the capital of America's history. It seeks to show how—by approaching historic buildings in a strategic and uniform way—we can tell the story of America from 1700 to 1865 within one square mile. The most familiar elements of this story and how to tell them—e.g., the struggle for Independence—are well known, and need not be spelled out. Instead, this paper concentrates on showing how, by changing our interpretive approach to a few other buildings, we can tell what came before and after equally well.

1. Friends' Meeting—William Penn: Religious Liberty in the Colonies
2. The Mercantile Exchange: Adam Smith and the Rise of Capitalism
3. The First Bank of the United States—Hamilton and the Federalists
4. The Second Bank of the United States—the Jacksonian Era
5. Mother Bethel Church: Slavery and the Civil War and Abolition

As the custodian of the resources, the National Park Service has the opportunity and obligation to showcase its buildings to their best advantage, and to interpretively integrate them into the large stories of which they are part. Although not all of these buildings are currently controlled by NPS, the Park Service can act as the catalyst for such a plan. The General Management Plan offers a singular occasion for rethinking how these buildings are used, and for taking the new approach outlined below.

By: Joe Tonella

J:\NPS\COMMON\CONCETTA\TONELLAS12

RESPONSES

COMMENTS

EDMUND N. BACON

September 16, 1995

Ms. Martha B. Aikens
Superintendent
Independence National Historical Park
National Park Service
311-313 Walnut Street
Philadelphia, PA 19106

Dear Superintendent Aikens:

Thank you for sending me the Draft General Management Plan Environmental Impact Statement for Independence National Historical Park, dated August, 1995, which I have read with interest. As you know, I have been involved in the development of this plan, having attended the various meetings you have had on the subject.

I accept your invitation to attend the meetings of October 5 or October 6, in order to formulate my comments on your proposal before those dates. I need some additional information, which I would appreciate you sending me as soon as convenient, as follows:

- 1 - What was cost of the Visitor's Reception Center?
\$_____/_____/_____. _____
- 2 - When was it completed? 19__.
- 3 - Who was the architect? _____
- 4 - What square footage does it cover?
a - Total site. _____ Sq. Ft.
b - Area occupied by buildings. _____ Sq. Ft.
- 5 - What are the dimensions of the tower?
a - Base. _____ feet x _____ feet.
b - Height _____ Feet.
- 6 - What does the tower contain?
- 6 - Can the exhibits it contains be seen by the public?
Yes _____ No _____
- 7 - What is the purpose of this tower? _____

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

DIS (INDE)

October 4, 1995

Mr. Edmund N. Bacon

Dear Mr. Bacon:

Thank you for your recent letter regarding the General Management Plan for Independence National Historical Park. I asked Delirdre Gibson to speak with you in response to your letter, and after your telephone conversation, she felt that a detailed written response also would be appropriate.

In many ways, it is we who should seek information from you, who has a long history with the planning for the park. In your former role as a member of the local Advisory Committee for the Visitor Center at Third and Chestnut Streets, you may remember that the 20,000 square foot building was completed in 1974, at a cost of some \$1.3 million. The Architect was Peter Chernyavoff, of Cambridge Seven. The tower contains the Bicentennial Bell, which can be heard but not seen by the public.

The Liberty Bell Pavilion was completed in 1975 at a cost of \$0.9 million. The Architect was Romaldo Giurgola. There are two reasons for the National Park Service's desire to erect a new Liberty Bell Pavilion. The first is to house the Liberty Bell in a more secure location farther from public streets. The second is to provide a better interpretive experience for the visitor by creating a contemplative space surrounding the Liberty Bell where people may observe it free of the distraction of spoken messages from interpreters.

The Fountain of Freedom project was initiated in the late 1980s, and a design was prepared by Bruce Thompson, then of Mitchell/Giurgola. The project lapsed when it became clear that its large scope would require a supporting planning process

RESPONSES

2

- 8 - How much did the tower cost to build? \$_____
- 9 - When was the Liberty Bell Pavilion completed?
- 10 - How much did it cost? \$_____
- 11 - Who was the architect? _____
- 12 - What agency commissioned and supervised construction of this building? _____
- 13 - Why does the National Park Service propose to demolish this building and build a new one in its place?

I recall that Hobart Cawood, when he was Superintendent of Independence National Historical Park initiated a project to demolish the Edwin O. Lewis Fountain and to build in its place some sort of monument to the Constitution.

- 14 - When was this project initiated? 19__
- 15 - How much money was collected for this project? \$_,'_,'___,-'___.
- 16 - Where is this money now? _____
- 17 - Who were the architects which the National Park Service commissioned to design this project? _____
- 18 - How much money was paid to these architects for their design? \$_,'_,'___,-'___.
- 19 - When was this project abandoned? 19__
- 20 - Why was this project abandoned? _____


I recall that rocks from each of the States were collected by the National Park Service for the construction of this project.

2

similar to the current General Management Plan. The boulders that were collected from the 50 states remain in storage and there is no current plan for their use.

I look forward to seeing you at the public meetings this week.

Blindly,

Sincerely,

 Martha B. Aikens
 Incoming student

Journal 10: **Martha B. Aikens**
Superintendent
Independence National
Historical Park

RESPONSES

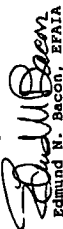
COMMENTS

3

I would appreciate receiving answers to these questions in the near future so that I may complete the comments which which you asked for prior to the October 5th or 6th meeting.

Thank you very much.

Sincerely,


Edmund N. Bacon, EPA/EA

COMMENTS

RESPONSES

EDMUND N. BACON • [REDACTED]

September 17, 1995

FAX - (215) 567 1658

Ms. Martha B. Aikens
Superintendent
Independence National Historical Park
National Park Service
311-313 Walnut Street
Philadelphia, PA 19106

Dear Superintendent Aikens:

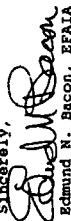
I apologize to you. In my letter to you of September 16, I had forgotten one question, I had intended to ask you in preparation for your October 5 or 6 meeting to discuss your plans for Independence Hall.

The question is:

23 - Do you think the architecture of the Visitor's Reception Center tower fits in harmoniously with the previously beautiful skyline of this historic area defined by the cupolas of the Merchants Exchange and Carpenter's Hall, the tower of Independence Hall and the spire of Christ Church?

I look forward to your answer.

Sincerely,


Edmund N. Bacon, EPA/IA

COMMENTS

10/11/88 15:03 0215 397 1003 INDE 002/003
PLNG & DEV (760) PARK PLANNING 002/003

EDMUND N. BACON

October 7, 1993

FAX - (215) 567 1658

Hon. Roger Kennedy, Director
National Park Service
1849 C Street, N.W.
Washington, D.C., 20204

Dear Director Kennedy:

I hope you realize we are firmly set on a collision course. Each day that passes brings us closer to the November 20 cutoff of public debate of the plan for Independence Mall, imposed by the National Park Service. The way things are going now this can become pretty nasty, especially since all of it is being enacted under the shadow of the Liberty Bell.

There is a pleasant and gentlemanly way out of all this. You are the only person in the world who can pull it off.

I suggest that you personally attend the October 18th opening of my exhibit of my plans for Independence Mall at the Nevalson Museum of the James A. Byrnes U.S. Courthouse at Sixth and Market Streets in Philadelphia at 10:00 AM.

I suggest that you thank me for responding so thoughtfully and graphically to Martha Alkens' invitation to all of us to participate with her in the planning of Independence Mall, and, along with my fifteen artists, for producing such a fine personal vision for the development of Independence Mall.

I suggest that you announce that all cutoff of public discussion by the National Park Service on any topic is hereby cut off forever. I suggest you then pledge that National Park Service never again will ask the public to review any plan affecting the physical development of any property, whether it is called a Management or a Physical plan, without first producing models and plans at least as specific, detailed and thoughtful as are the ones I have produced, so anyone may see exactly what we will be getting under any National Park Service proposals before the National Park Service makes such proposals.

Further that you pledge that the National Park Service will produce a plan for Independence Mall with models and details, either based on my proposal or, if it deviates, the Service will offer a full explanation of why and how it deviates, and that the National Park Service will allow full public debate on such a specific plan before legislative review or execution of such a plan. The justification for this proposal is that my plan is carefully considered and unified. Your casual scattering of numbers is worthless.

RESPONSES

OCT 11 1993 16:19 R. KENNEDY TEL: 202 208 7889 P. 001



United States Department of the Interior

NATIONAL PARK SERVICE
P.O. Box 37137
Washington, D.C. 20015-7137

D18(2500)

OCT 24 1993

Mr. Edmund N. Bacon

Dear Ed:

Thank you for your invitation to view a display of your ideas for Independence Mall. Though I cannot get there myself, members of my staff in Philadelphia certainly will attend the display during its run.

I am pleased that an architect of your renown continues to have a strong interest in Independence Mall. You have made contributions to Urban Design which the world applauds, and now, to your immense credit, you are expressing a desire to help us toward a fresh resolution of the many goals and needs identified by the community and the broader national and international community.

The General Management Plan (GMP) is now near completion, comprising a set of goals and a program for the park as a whole. The November 20 date represents the end of public comment on these goals and program. There has been ample comment, for which we are grateful. The GMP then becomes precursor to schematic and detailed design for Independence Mall, which we all anticipate with interest. That design project will be accompanied by a program of further public participation, including significant participation by the Philadelphia design community. We certainly hope that you will continue to give us your views as the process unfolds.

Sincerely,

Roger G. Kennedy
Director
cc: Field Director, Northeast Area
Superintendent, INDE

RESPONSES

COMMENTS

20/11/85 15:02 0215 197 1003 0003/003
10/11/85 10:45 0202 212 2222

NAME - ... PARK PLANNING

If you are unable to come to the October 18 opening in person, perhaps you could send a letter covering these points to be read there by Martha Atkins or someone else.

Please let me know what your plans, if any, are so I may determine my course accordingly.

I do offer you personally a very heartfelt invitation to my opening and do hope that you will come. I am confident that you will find my plans to be very interesting. I trust that, if you are not there in your absence there will be some expression of your spirit which will get us all off the terrible track we now are on.

Sincerely,


Edmund H. Bacon, ZPAIA

COMMENTS

EDMUND N. BACON

October 24, 1995

FAX - (215) 567 1658

Martha B. Aikens, Superintendent
Independence National Historical Park
National Park Service
311-313 Walnut Street
Philadelphia, PA 19106

Dear Superintendent Aikens:

I understand that, after your cutoff date, November 20, of any further discussion of your preferred plan for Independence Mall, you will have legislation introduced into Congress to make your preferred plan into law. I assume this will require some sort of public hearings in Washington.

I sent you a special invitation to the opening of the suggested plans which I and seventeen artists developed for Independence Mall in response to your invitation, as contained in your letter dated September, 1995, "to be involved in completing this plan." I asked you, if the opening date were not convenient to you, to let me know some other time you could come so I could arrange to be there to explain the plan to you. I sent two letters to Roger Kennedy, Director of the National Park Service, inviting him to the opening. I heard nothing from either Roger Kennedy nor you and there was no representative of the National Park Service at the opening.

On October 19, the second day of the exhibit, you snuck into the exhibit without warning. Fortunately I happened to be there. You didn't seem very interested in my explanation. You tried to sneak out the door without saying anything to me. I managed to catch up with you before you disappeared. I asked you what you thought of what you had seen.

Your only comment was, "You have done a lot of work".

This seems to me to be pretty shoddy treatment by both you and Roger Kennedy considering the care which I and my associated artists put into this exhibit. It seems to cast a pall on the sincerity of your invitation to me to become involved in the planning of Independence Mall.

I believe the next step in your process will be federal legislation freezing your preferred plan. I assume this will involve public hearings before some sort of legislative body before your plan is legally frozen. I would appreciate your letting me know when and where such legislative hearings will be held. I trust you will make arrangements for me to testify.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

BY EDWIN HAYES TO:

D18 (INDE)

October 27, 1995

Mr. Edmund N. Bacon

Dear Mr. Bacon:

I have received your letter of October 24, which contains some points of confusion that I will attempt to clarify for you. While it was good of you to enthusiastically accept the invitation to "help complete the plan," the invitation clearly referred to the current draft General Management Plan (GMP) for Independence National Historical Park, as opposed to a future design process for Independence Mall. As I commented after your presentation, I am impressed by the amount and level of thought you and your assistants have contributed toward Independence Mall, even though it is premature.

The invitation to comment on the draft GMP went to approximately 1700 people on the our mailing list and to countless others through announcements and coverage provided by the press. In response, quite a few citizens in addition to yourself have contributed detailed plans, letters, and verbal comments on the draft GMP for the park. Under the law, we treat all such contributions in a similar fashion, as valid submissions well worthy of consideration. No one, no matter his or her status, is afforded special treatment, as this would violate both the letter and the spirit of the law.

I was pleased to be able to visit your exhibit when an unexpected opening appeared in my schedule. My arrival at your exhibit could scarcely be construed as "sneaking in," since I arrived with three other National Park Service employees, one of whom was in uniform. And while one could infer that you have little interest in dialogue, I certainly did not attempt to "sneak out," and in fact, at the time you asked for my reaction, I was attempting to gather a set of your descriptive handouts, in the hope that they might constitute written comment on the draft GMP. Please understand that as detailed as your exhibit is, it does not constitute comment on the draft GMP, which we hope you'll come to understand, is a program and not a design. If you would care to send written comment on the draft GMP that is under consideration now, we will be pleased to respond in writing, as we do for all the letters we receive.

COMMENTS

2
I think it would be appropriate to review the record of the National Park Service's stewardship of our most precious historical area, including the ripping apart at great public expense of the historic townscape which formerly provided an appropriate setting for the historic structures, specially the First Bank of the United States, the destruction of irreplaceable historical buildings including the first skyscraper in the United States, in order to build the Visitor's Reception Center which now, twenty years later, you intent to scrap, including the huge, costly, useless and senseless tower which should never have been built in the first place, which is an insult to the formerly beautiful eighteenth century skyline, and which is totally empty now except for a statement by the Queen of England and a fake Liberty Bell which you can't see.

I think it would be appropriate to recount how the National Park Service moved the Liberty Bell into one of the most egregiously ugly buildings ever built which now, after twenty years, you propose to scrap and replace with a new structure of which you have shown not a glimmer of what it would look like nor why it would be any better than the horrible one you built twenty years ago.

I will show the Congress the product of your two years of work and expenditure of countless taxpayer dollars, one piece of paper containing three blue rectangles with seventeen numbers capriciously scattered about with no underlying rationale nor explanation of why they are where they are. Also I will show Congress the models, drawings and paintings which we produced in six weeks and concerning which you and Roger Kennedy have said nothing but, "You did a lot of work".

I look forward to receiving information about the congressional hearings.

Sincerely,

Edmund N. Bacon
Edmund N. Bacon, EPAIA

CC: Hon. Thomas Foglietta
Hon. Roger Kennedy
The Press

RESPONSES

2
Again, I will try to convey to you that November 20 is the date for completion of public comment on this phase of the draft GMP. Because the alternatives were originally presented for public comment in September, 1994, presented in a revised version in January, 1995, and again in August, 1995, there can be no doubt that there has been adequate time for the public to review, discuss and comment on them. Another comment period will open in the Spring after the final GMP is published and distributed.

Although the NPS has often published and discussed the public process and the approval process, you mistakenly believe that the United States Congress will oversee the final decision. In fact, the Field Director of the Northeast Field Area of the NPS, headquartered here in Philadelphia, is responsible for the final decision on the GMP. Congress is not involved, nor is the plan to be "legislated into law."

Thanks again for the presentation on Thursday, October 19th.

Sincerely,

Mark A. Wilkins
Mark A. Wilkins
Superintendent
Independence National
Historical Park

COMMENTS

MUND N. BACON

November 6, 1995

FAX - (215) 567 1658

Martha Aikens, Superintendent
Independence National Historical Park
National Park Service
313 Walnut Street
Philadelphia, PA 19106

Dear Superintendent Aikens:

Consistent with your expressed desire to hear and consider the voice of the people before settling the final plan for the development of Independence Mall, you have invited all of us to submit to you in writing before your cutoff date for public comment on the plan of November 20, our comments on your plan entitled, "THE NATIONAL PARK SERVICE'S PROPOSAL FOR INDEPENDENCE NATIONAL HISTORICAL PARK", consisting of three blue rectangles on which are distributed twelve numbers establishing the final location for the twelve structures you which you propose be placed on the Mall.

In accordance with your invitation, I respectfully submit the following comments:

1. 3. CONSTITUTION PLAZA.

This you describe as "a new outdoor public space" to accommodate demonstrations, festivals and other large events.

It would seem that your use of the word "NEW" requires the demolition of the twenty six marble and brick pavilions, the Promenade of the Colonies, which exist there now, as well as the plaza between them which has fulfilled this purpose for many years, and which provided what seemed to be an excellent setting for the tent you erected for the announcement of this plan.

It would seem prudent first to consider whether the structures now there could be rehabilitated and adopted to your purposes as an open option until detailed studies of the type I believe you plan to do are completed.

For this reason I suggest that you strike the word "NEW" from you description of item #1.



IN REPLY, REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

November 13, 1995

Mr. Edmund N. Bacon

Dear Mr. Bacon:

Thank you for your letter of November 6 commenting on the National Park Service's preferred alternative from the draft General Management Plan (GMP) for Independence National Historical Park. Although you seem to have reviewed the summary newsletter rather than the lengthy plan, please allow me to clarify your understanding of our proposal.

In our description of Constitution Plaza as a "new outdoor public space," the word "new" is used to indicate that an alteration to the extant condition is being proposed. It is not intended to be a definitive statement regarding future design and construction. During future design phases, decisions will be made regarding the feasibility of reuse or rehabilitation. Please refer to the draft GMP for a description of the problems associated with use of the current space for public events.

Throughout the last two years of the GMP process, options for relocating the Liberty Bell to the second or third blocks of Independence Mall were presented to the public. In response, we overwhelmingly heard from the public a desire to keep the Liberty Bell as close to Independence Hall as possible. The preferred alternative of the GMP proposes retaining the Liberty Bell on the first block of Independence Mall, in a new or redesigned pavilion. A primary goal of positioning the Liberty Bell Pavilion is to retain the strongest possible visual sense of connection to Independence Hall. Studies done prior to the bell's relocation in 1975 were conclusive both then and now that a location on axis with Independence Hall provides the best visual and symbolic relationship between the two icons. Modification of the pavilion would be intended to provide a contemplative space surrounding the bell where people may observe it free of the distraction of spoken messages from interpreters. We believe that the Liberty Bell Pavilion will continue to work best on the first block of Independence Mall.

COMMENTS

2

2. 9. A REDESIGNED LIBERTY BELL PAVILION

The final resting place of the liberty bell is a decision of far reaching effect on the reputation and economic welfare of Philadelphia, as well as the way our most sacred historic artifacts are presented to the world. There is a large section of Philadelphia citizens who believe that the location of the Liberty Bell in the 1st Block was a mistake in the first place and should not be repeated now. The Constitution Center Commission has shown us a splendid concept of placing the Liberty Bell where the defunct Edwin O. Lewis fountain stands now just north of Market Street. This would restore the original intent of the Plan for the Mall, utilizing the 1st Block as a greensward providing a fine foreground for Independence Hall as does the authentic Eighteenth Century greensward provide for the Governor's Palace in Williamsburg. The thousands of people who travel along Market Street every day would receive an uninterrupted view of Independence Hall to the south, and a splendid view of the Liberty Bell to the north.

I respectfully suggest that you move item #9 from the 1st Block to the 2nd Block.

3. 17. NATIONAL CONSTITUTION CENTER.

The National Constitution Center is proposed to be a centerpiece of Independence Mall and should be put in the most accessible and convenient place for the visitor. The Constitution Center Commission has shown us a plan which would place the National Constitution Center in the 2nd Block. This seemed to work very well. You have given us no explanation why you have moved it to the 3rd Block.

I respectfully suggest that you move item #17, A NATIONAL CONSTITUTION CENTER to the 2nd Block.

I realize that there is little time left before your cutoff date of November 20 to give adequate consideration to these comments and to such other comments as you may receive.

Therefore I make one simple overall suggestion as follows;

I respectfully suggest the you eliminate all reference to the location and character of all structures proposed to be placed on Independence Mall from your the General Management Plan which you are proposing to freeze on November 20; that you defer final determination of these points until you have entered the Physical Design Phase of your work.

RESPONSES

2

The National Constitution Center (NCC) was conceptually placed on the third block for several reasons. If constructed, the NCC will provide an important and attractive anchor at the northern end of the mall, offering a destination that can be a fitting bookend to Independence Mall. The NCC has the potential to be a sizeable building, one that cannot fit onto the second block. Given the other functions that need to occur on that block, a second block location for such a major element as the NCC also would tend to isolate the third block and make it irrelevant to the rest of the mall. Finally, we believed that the proposed visitor center is the most appropriate initial destination for visitors to the historic district, and to be effective, it must be located as close as possible to the existing underground parking garage.

While the CUP does not predict the character of structures, there are valid reasons for proposing general locations. In order to provide a reasonable level of information for the public to assess the alternatives for management of the park, it is critical to indicate the relationship of functions and programs to the physical environment of the park. The conceptual alignment of functions is not intended to be a foot print for future construction, however.

Your assumption that additional detailed studies will be undertaken is correct. The National Park Service intends to undertake studies as necessary in the preparation of any comprehensive planning or design development work that may be pursued at this park.

Sincerely,

Martha B. Atkins
Martha B. Atkins
Superintendent
Independence National Historical Park

RESPONSES

COMMENTS

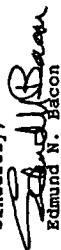
3

It seems reasonable to assume that the detailed studies of traffic and parking, bus and automobile unloading, visitor movement through the various areas, the influence of the location of the various elements on the efficiency of security and maintenance and operation, considerations of security and control, would shed considerable new light on the most desirable location for the various structures, and that the public debate on these matters would be facilitated by the designs, models, drawings and other studies which I assume you will make in the course of the Physical Design Phase of your work.

The final determination of the locations of the various individual structures on Independence Mall should grow out of the overall physical and functional design plan, not precede it.

I hope these comments will be helpful to you in your work which is of such decisive importance, not only to the historic areas themselves, but to the well being of the city which contains them.

Sincerely,


Edmund N. Bacon

CC: Philadelphia Daily News
Philadelphia Inquirer

COMMENTS

AUND N. BACON

November 18, 1995

FAX - (215) 567 1658

Martha B. Aikens, Superintendent
Independence National Historical Park
National Park Service
313 Walnut Street
Philadelphia, PA 19106

Dear Superintendent Aikens:

This is in response to your letter, dated September 1995, which invited me to be involved in completing the plan for Independence Mall. Accompanying this letter was the Draft General Management Plan and Environmental Impact Statement. You also invited me to send you comments on the six Alternative plans presented therein.

After careful study I find all six of your alternatives, A to F, including your Preferred Alternative E, to be seriously deficient in one or more respects. I have, therefore, consolidated my comments into a single comprehensive plan. This borrows some elements from each of the six alternatives, and adds the element which I found lacking in all six, a clear, coordinated, overall concept which binds the various elements together into one coherent whole. I have entitled my plan **ALTERNATIVE G**.

ALTERNATIVE G**First block of the mall.**

9. Existing Liberty Bell Pavilion to be demolished, restoring the plan of Independence Mall to its original condition, providing a clear, uninterrupted view of Independence Hall from Market Street.

Second block of the Mall.

1. A Regional Visitor Center in the northwest corner connected with a bus and automobile dropoff adjacent to Sixth Street
2. An Independence Park Institute adjacent to Fifth Street with a fine overlook of Christ Church Burying Ground.
3. Constitution Plaza. I can't see the reason for tearing something down and then building the same thing up again under a different name. Wouldn't it be better just to leave the present plaza alone and call it "Constitution Plaza"? That is what I have done.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

D18 (INDEX)

January 22, 1996

Mr. Edmund M. Bacon

Dear Mr. Bacon:

Thank you for your letter of November 18, in which you propose a general management plan (GMP) alternative for Independence National Historical Park that you entitle "Alternative G."

After studying your proposal, we note that it addresses only physical design, and only for Independence Mall, and does not constitute a comprehensive plan for the entire park. As you have noted, each of the elements you have proposed has previously been included and evaluated in one or more of the six alternatives in the draft GMP. We also have previously commented on your proposal, most recently in my letter of October 27, 1995.

As you know, your proposed rearrangement of possible physical elements for the mall was not applicable to the GMP. We do intend to consider them when a design process is initiated in the spring. Thank you for your continuing efforts on behalf of the park.

Sincerely,

Martha B. Aikens
Superintendent

RESPONSES

COMMENTS

- 2
4. Constitution Memorial to be located on the center line of the block just south of Arch Street.
 5. Quaker Meeting House to be improved.
 6. Judge Edwin O. Lewis Commemoration to be located just north of Market Street.
 9. A redesigned Liberty Bell Pavilion on the site of the Edwin O Lewis Memorial Fountain would better serve the public and would provide a presence for the Liberty Bell on Market Street.
 17. A National Constitution Center to be located on Fifth Street south of Arch Street extending under the Constitution Plaza to the Liberty Bell Pavilion.
- Third Block of the Mall
18. Picnic Area The present Third Block offers sufficient informal picnic area.
- The three once magnificent fountains on the central axis of the Third Block, now decommissioned and planted with willow trees which block the view of Independence Hall, should be restored to their original working condition to serve as the central feature of this block. These three fountains with their walkways should be preserved as part of a permanent open space easement extending from Arch to Race Street.
- The development of the remainder of the Third Block should not be committed now. It should be reserved for the decision of future generations.
- Since there are funds for the immediate development of only small portion of the Second Block, and since your Preferred Alternative would require the demolition of the entire Second Block at one time, this would mean that the remainder of the block would remain vacant, unsightly and derelict, probably stretching out over a number of years.
- ALTERNATIVE G would preserve the existing plaza and Promenade of the States. It would permit the construction of the Liberty Bell Pavilion without disturbing the terraces, mature trees and stairways that exist along the north side of Market Street. As now constituted these would provide the Liberty Bell with a distinctive and dignified setting. The integrity of the connection of the design of Independence Mall on one side of Market Street with the design on the other side would not be disturbed.

RESPONSES

COMMENTS

Detailed studies in **ALTERNATIVE G** show that the needs of all of the elements, which your Preferred Alternative spreads out over the three blocks, can comfortably be accommodated within the boundaries of the Second Block. Each one of the separate units can be constructed independently of the others. All of them can be constructed without disturbing the existing plaza and the promenade of the States. Detailed architectural studies, drawings and models which show that this is possible have been prepared and are available to you.

Placing all of these functions under one roof as provided in **ALTERNATIVE G**, all within the confines of the Second Block will, in the long run, save large amounts of money every year for operation, maintenance, service, insurance and security because of the compact, efficient layout.

Placing all of these functions in one block as provided in **ALTERNATIVE G**, will make the tourist's visit enormously more convenient and pleasant because all of these functions can be reached from the first moment of arrival through continuous, protected, covered, climate controlled spaces. **ALTERNATIVE G** will eliminate unsightly and inconvenient lines of people standing in the scorching sun and drenching rain wanting to get in to see the Liberty Bell.

ALTERNATIVE G will eliminate the need for the \$468,000 item you included in your Preferred Alternative for the demolition of the whole of the Second Block. This money could be used to engage artists to paint the murals of the States in the arches of the Promenade of the States, and also in the much smaller arches of the Children's Promenade which lies between the two rows of large arches, from which children get so much fun now even before there is anything interesting to see there.

Money from this item could be used to engage world renown artists such as Maurice Sendak to paint the life of children during the revolutionary days, incorporating these in a book which would attract children from many parts of the world to come here to see painted on the walls of the Children's Promenade the characters they have come to love.

My comment is that I request that, in your future studies, **ALTERNATIVE G** be given consideration equal to that given to the other alternatives, and that **ALTERNATIVE G** be selected as the guide for the future development of Independence Mall.

Respectfully submitted,



Edmund N. Bacon, EPAIA

COMMENTS

PENELOPE HARTSHORNE BATCHELER

Sept. Martha B. Atkins
 Incl. Nat'l Hist Park
 Nov. 16, 1996

Dear Martha -

I have a comment for the Gen'l Management Plan Preferred Alternative:

If the new visitor center is to be in town with my concern is that fewer people will benefit from what is offered by the Park between 5th & 2nd streets. Therefore I suggest that perhaps the Independence Park Institute and the Philadelphia public school classes could be the occupants of the existing Visitor Center on 3rd Street.

This building is suited to people use - with its 2 theaters - conference and

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
 Independence National Historical Park
 313-315 Walnut Street
 Philadelphia, PA 19106

IN REPLY PLEASE TO:

D18 (INDE)

January 22, 1996

Ms. Penelope Hartshorne Batcheler

Dear Penny:

Thank you for your letter commenting on the preferred alternative for the park's draft General Management Plan. I appreciate your continuing efforts in the park's best interests.

For several reasons, we believe that the best location for the proposed Independence Park Institute and the existing Philadelphia School Program will be near or with the new visitor center on the second block of Independence Mall. The mall location is much closer to facilities that we anticipate will be associated with these programs, such as the Balch Institute, the Atwater Kent Museum, the Afro-American Cultural and Historical Museum, the future National Constitution Center, and others. This location also will be set up to accommodate tour and school buses, obviating the need for them to travel the narrow and congested streets of Old City.

In the existing Third Street Visitor Center, the restrooms will continue to be available for visitors who come to the small visitor contact station that will remain in this building. The bulk of the building would need extensive modification regardless of its future use. Modification would be needed to the open court to make it functional whether for an educational facility or for curatorial storage. The two theaters which occupy so much of the building are far too large for the anticipated educational programs and if not extensively changed, would mostly remain unused.

Use of the First Bank for curatorial storage would require extensive rehabilitation of the structure, with the potential of adversely affecting the historic fabric of the building. The preferred alternative anticipates that special exhibits can continue to be staged on the first floor of the building.

The plans for 313-315 Walnut Street include rehabilitating the building for park administrative uses or historic leasing. The

COMMENTS

classrooms could be built into the open "court" and bookstore - if already is well provided with WCs - and bus drop-offs are oriented correctly - just need to have the buses move on to remote parking. The young people who have attended special programs there will be best entered to walk the long distances to enjoy what is offered at the mall.

I am worried about the preferred alternative suggestions that the present Visitor Center be used for Curatorial Storage. The thinkers would need enormous renovations for storage use - the present open "court" has too high a light level for exhibit displays (unsafe for objects preservation) and the present ice facilities would be underutilized.

May I suggest instead that the First Bank be used for Curatorial Storage in the cellar so is, and the upper floors for furniture

-2-

RESPONSES

2

First Bank location provides both administrative and special event space for the friends groups, whose needs for office space are relatively small.

Thank you again for your comments.

Sincerely,

Martha B. Atkins
Martha B. Atkins
Superintendent

RESPONSES

COMMENTS

PENELOPE HARTSHORNE BATCHELER

and fine arts. The first floor can be used for display - or special exhibits as well. It seems to me that the "friends of the park organizations" (p. 51) could stay at the 313-19 Walnut Street offices - requiring no renovations - with room for expansion if park offices if need be in the future.

Thanks for listening -

All good wishes -

Penny H. Batcheler

- 3 -

COMMENTS

RESPONSES

PENELOPE HARTSMORNE BATCHELER


To the Editor
The Philadelphia Inquirer

I agree with William C. Kashatus' article:
"No quick fixes at Independence Hall" (Nov. 17, '95).

Visitors won't come to Philadelphia for more than three hours unless they know ahead of time there is to see and enjoy. They have to know ahead so they can make hotel reservations, etc.

Mr Kashatus is right, MARKETING is the tool to sharpen here.

He is, also right, we should utilize the buildings we have. The Constitution Center could well be put in the First Bank of the United States.

Considering this country's need to balance the budget I don't think we should embark on

RESPONSES

COMMENTS

in a multi-million dollar building space, using not by in the next five years to have world-wide, superb, coordinated marketing of Independence Park and the other city sites. Philadelphia has been in secret too long.

Penelope H. to home Butler
Retired Restoration Architect at
Independence National Historical Park

November 16, 1995

COMMENTS

Dwight E. Bechtel

November 16, 1995

Martha B. Alkens
Superintendent,
Independence National Historical Park
313 Walnut St.
Philadelphia PA 19108

Dear Superintendent Alkens:

I am writing to you as a neighborhood resident to express my opinion relative to the proposed plan for Independence Mall. I have read the reports of your plan, I have read your letter to the Inquirer, and I have read of Edmund Bacon's plan.

The conceptual plan outlined by the Park Service is pedestrian in its vision. It lacks imagination and it is not worthy of the grand space it seeks to utilize. You should, in fact, be embarrassed by this plan. The plan outlined by Edmund Bacon is far superior. The concept of progression from Visitor Center to Constitution Center to Liberty Bell to Independence Hall is a natural. It certainly is superior to the maintenance shed on the Mall!!

I trust you will recognize the superiority of the Bacon plan, and I look forward to the abandonment of the ill-conceived Park Service plan.

Sincerely,



Dwight E. Bechtel

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

BY FAX/REPLY TO

D18 (INDE)

January 22, 1996

Mr. Dwight E. Bechtel

Dear Mr. Bechtel:

Thank you for your letter regarding the General Management Plan (GMP) for Independence National Historical Park. I appreciate your interest in the park and would like to take this opportunity to answer a misconception you may have regarding the GMP.

The GMP, initiated two years ago, provides the park and the public with an opportunity to review and discuss the park's mission, goals, and role in the nation and the community. It is a broad management guideline, prepared with the aid of hundreds of citizens who participated in 14 public workshops and several meetings.

Mr. Bacon has proposed a physical design for Independence Mall, just one part of the park. His work is interesting, yet it is premature. Physical design for the mall is the next step, and purposefully was not part of the general management plan phase, which can be considered as an outline. Although a GMP is a necessary and appropriate foundation to a physical design, comparison of a management plan to a physical design is a comparison of apples to oranges. I have enclosed a copy of the GMP and of a newsletter that summarizes the proposed management plan for your use in evaluating the work that the National Park Service has done.

Our physical design process will begin in the spring of this year and will be open to the public, just as the GMP process has been.

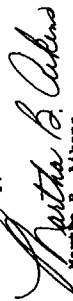
COMMENTS

RESPONSES

2

Mr. Bacon's proposal and those of many others will be fully considered at that time. I would be pleased if you would participate.

Sincerely,


Martha B. Aikens
Superintendent

enclosures (2)

COMMENTS

Thank you for the mail in N.P.H. I was pleased to receive the Park along - please no chintzy stuff believe me because long we'll be more active line and help the city company

123456789101112131415161718

Heleen Braun

Heleen Braun

RESPONSES



United States Department of the Interior
NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

01 8471 0070 70

D18 (INDE)
December 11, 1995

Ms. Heleen Braun

Dear Ms. Braun:

Thank you for your note regarding Independence Mall. I enclose a synopsis of the National Park Service's proposal for all of Independence National Historical Park for your information.

Sincerely,
Martha B. Atkins
Martha B. Atkins
Superintendent
Enclosure

COMMENTS

UNIVERSITY of PENNSYLVANIA

School of Arts and Sciences
Department of History
207 College Hall
Philadelphia, PA 19104-6379
215-896-6452/3
Fax: 215-573-2099

Mrs. Martha B. Aikens
Superintendent,
Independence National Historical Park
311 Walnut Street
Philadelphia, PA 19106

Dear Ms. Aikens:

Thank you very much for sending me a copy of the Draft General Management Plan for INHP; as a Professor of History at Penn who has taught all of that University's undergraduate and graduate courses on the Revolution and Constitution for the past quarter of a century, I was pleased to have the opportunity to study the various alternatives you are considering as you plan for the reinvigoration of Independence Park. And I congratulate you for the progress you have made in that endeavor. While I have some small preference for Alternative F over your "Preferred" Alternative E, I believe that both of those alternatives (or perhaps even better, some combination of the two) constitute a significant step forward for the National Park Service and the City of Philadelphia.

My own primary interest and expertise in these matters focuses less with the architectural layouts of the various sites in the Park as it does on the interpretation that will take place within those sites. For that reason, I would be very grateful if you would send me your new interpretive plan as well. I strongly believe that the vigor and imaginativeness of the interpretation of the ideas and events of the revolutionary and constitutional eras will, in the long run, be the most important element in the success of the INHP in attracting and educating the millions of visitors who come to the nation's birthplace, and I am anxious to do whatever I can to help the Park Service move forward in this important matter.

Sincerely,

Richard R. Beeman
Richard R. Beeman

September 25, 1995

RECEIVED

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

D18 (INDE)
January 22, 1996

Professor Richard R. Beeman
School of Arts and Sciences
Department of History
207 College Hall
Philadelphia, Pennsylvania 19104-6379

Dear Professor Beeman:

Thank you for your letter on the General Management Plan and for the comments you made at our public meeting in October 1995. I agree that while facilities are important, it is the interpretation of the ideas and events related to the country's founding and early nationhood that is the most important and engaging thing we can do. I will welcome your participation in the future.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

COMMENTS

11/20/85 11:11 0215397033
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NOT A OPER *** INDE @ 002/002
 NPS/LEGISLATION --- NPS-MRD @ 003/003



Roger Kennedy
 Director, National
 Park Service
 1849 C Street, N. W.
 Washington, D. C. 20204

October 31, 1995

Dear Roger Kennedy:

I had the great pleasure of participating in the October 18th opening of Edmund Bacon's exhibit of plans for Independence Mall. The Nevelson Museum was alive with a crowd eager to hear what this visionary would have in mind.

A thirty five year resident of Philadelphia, I have considerable stock in the decisions made about the future of the city. And like many architects, planners, and civic leaders, I listen to Ed Bacon. His plan was exciting and solid. I particularly responded to the Children's Promenade and the Pool of the States. I believe that there is a vast space that is underutilized by children and by organized school groups. It was heartening to note a design plan that was so inclusive of our youngest visitors. The plan, with some minor adjustments, would doubtless be an instant improvement over existing facilities.

I understand that the news media followed up with a series of articles over the next week including an editorial in support of Edmund Bacon's position. His outrage over the lack of public debate, the lack of a plan or model openly displayed and discussed seems well founded. Philadelphia should be grateful for this watch dog approach, for this voice which alerted us to major changes in our prime historical and tourist location.

Please respond to Edmund Bacon's request for open review of the new plan for Independence Mall. Do not let a mediocre plan be implemented.

Sincerely,

Edmund Bacon
 Edmund Bacon
 Professor of Early Childhood Education
 Board Member, Educating Children for
 Parenting
 Advisory Committee, Lokooff Foundation

CC: Edmund Bacon
 Dr. Marcia Rogers

PHILADELPHIA OFFICE OF THE DIRECTOR, NATIONAL PARK SERVICE

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE

PO BOX 3707
 WASHINGTON, D.C. 20513-7107

Dis (INDE)

January 22, 1996

Professor Mildred Lane Berg
 Community College of Philadelphia
 1700 Spring Garden Street
 Philadelphia, Pennsylvania 19130

Dear Professor Berg:

Thank you for your letter regarding the General Management Plan (GMP) for Independence National Historical Park.

A comparison of Mr. Bacon's design for Independence Mall to the GMP is one of apples to oranges. A GMP is the result of a process that engages the National Park Service, state and local government, and the public in a lengthy discussion on goals for a park and the possible means to implement the goals. It does not incorporate physical design, but instead, is the necessary and appropriate precursor to design. We hope to initiate the next step - a design process for the mall - this year. Mr. Bacon's design for Independence Mall will be carefully considered at that time, as will many designs that interested citizens have shared with us.

There certainly has been no lack of public debate. During the past two years, the NPS has sponsored 14 public workshops and numerous meetings on the GMP, countless meetings with civic organizations and interest groups, four newsletters detailing the progress of the planning for the park, a televised town meeting, and a radio call in program. Dozens of editorials and articles have appeared or been broadcast by the local media during that period. I regret that you were not aware of the opportunity to participate during the GMP process. I do hope that you will choose to participate during the design phase.

Sincerely,

Roger G. Kennedy
 Roger G. Kennedy
 Director
 National Park Service

COMMENTS

The University Museum
University of Pennsylvania
33rd and Spruce Streets
Philadelphia, PA 19104-6324

Telephone 215 898-4000
Facsimile 215 898-0857

Oct. 9, 1995

Ms Martha B. Aikens, Supt.
Independence National Historical Park
313 Walnut St.
Phila., PA 19106

Dear Ms Aikens:

Thank you for sending me the Interpretive Media Plan draft for INDE. As I noted at the Oct. 6 public meeting on the Draft General Management Plan, there are some elements I should like to comment on. These are my thoughts on the Management and Media plans:

1. The Mall. Our Mall is tiny compared to the Washington Mall, and is easily crowded with construction that reduces its vista of the Hall. The NPS preferred plan is positive and doable, if unduly modest. At least the elements are there. But the Mall plan lacks a majestic symbolic construction to galvanize visitor attention and remain a logo in memory thereafter. Something that strikingly identifies the Philadelphia scene.

The proposal for the seven red columns of the U.S. Flag stripes in a semicircle at the north end of the Mall is compelling. (Possible complication in the future could be requests that lights be lit at the tops at Hanukkah.) A striking construction here is indeed needed. (If not the biggest Menorah in the world.)

If the Convention Center is placed at the north end of the Mall, it would have to be monumental in scope, a great colonnade semicircle (with the seven red columns before it) being one concept. But I would suggest that this great construction could embody on one side the interpretation of the Constitution and the other the Declaration of Independence. The two must receive equal emphasis. And the Bell should relate to both at the construction site.

Dedicating the West Wing of Independence Hall to the Declaration would be totally inadequate. The accommodations required are just not there. The Declaration is a magnificent inspiration to the Nation and to all nations. The setting of its interpretation must be inspirational to match.

I believe the Liberty Bell should be housed in and be the focal point within the Hall devoted to the Declaration of Independence with the Declaration immediately behind it. The idea of having the Liberty Bell in a construction blocking the vista of the Hall has become fixed in the minds of planners too long. It never had to be that way in the first place.

The only other plausible place for the Bell is in the center of Independence Square in an appropriate construction, allowing visitors to view the Bell with the immediate backdrop of the tower in whose predecessor it was originally housed. Barry's statue would then be placed in St. Mary's churchyard where it belongs, where his grave is located. There aren't enough Irishmen left in Philadelphia to block the removal of Barry's statue from the Square--if the matter is diplomatically handled. He can't compete with the Bell.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY REFER TO:

D18 (INDE)

December 11, 1995

Dr. John L. Cottar
Professor Emeritus
The University Museum
University of Pennsylvania
33rd and Spruce Streets
Philadelphia, Pennsylvania 19104-6324

Dear Dr. Cottar:

Thank you for your letter regarding the General Management Plan and the Interpretive Media Plan for Independence National Historical Park. I appreciate the time and thought you have devoted to studying the plans and preparing your comments. Your ideas are intriguing, and I have passed your letter on to the planning and interpretive teams.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

COMMENTS

RESPONSES

Cotter. IWE Plan - 2

The Visitor Center should ideally be below grade to avoid intruding upon the mall; if not, it could be alternatively located within the second block, on the west side opposite a history building dedicated to National, State, and Local History on the East side. A leaf could be taken from the Washington Mall and put them both below grade with simple, monumental entrances, so as not to impinge unduly upon the Mall vista.

2. Franklin Court interpretation as cited in the Interpretive Media Plan draft evidently ignores the story of Franklin's house even as the present underground museum does. This is to miss the whole key to Franklin Court, which is identified visually by the symbol of the house location and the archaeological evidence viewed below grade.

The plan calls for decking over the present well and reclaiming the floor space. I had proposed in my recommendations to the Superintendent of July 2, 1992 that the tri-part moving display viewed in the pit (Franklin at Versailles, etc.) be changed to a three-stage interpretation using models to show aspects of Franklin's house being built, as first completed, and as added to by a third on its east side. The voices of Franklin and Deborah speaking the words of their letters to each other describing the progress and prospects of the house as it was being built would interpret the model views.


Originally, before 1976, the argument of the architects was not to reconstruct the house above its original foundations as disclosed by archaeology on the premise of our not having an exterior contemporaneous view or delineations of the interior, by witnesses of the time. However, the concepts of the original aspects of the house exterior from the north before and after the addition of a third and of the elements of the interior hallway and other features to what has been documented historically and archaeologically, have been well-developed by architect William Campbell, whose drawings are on file, and have been used for The Buried Past data.

At least, the Franklin house should be depicted by models of its building and completed aspects on the floor of the redesigned museum. Alternatively, a shadowed room to exhibit a videotape of the house building and finished construction plus tentative interior views and associated artifacts could be played. Ultimately, the whole concept could be done with virtual reality technique as is now done to represent visually the Abbey at Cluny in Paris on the site of the medieval constructions now obliterated by city constructions.

3. Finally, it is suggested that the present sterile aspect of Welcome Park be revised so that the Slate Roof House is at least delineated on the ground by a foundation plan. This could be treated by a framework of house dimensions, as at Franklin Court. And at least pictured or model views of the house should be used. Photographs and drawings of the house are many, and have been used in the Buried Past. The occupancy of the house by William Penn and his family, and the birth of a son there is a long-needed reference for IWE visitors, for whom Penn is only suggested by his stature atop City Hall or the little copy now at Welcome Park. Penn deserves better than he has received at Independence National Historical Park. If it were not for William Penn there would be no Park and its story, as we know it.

I sincerely hope you will refer these suggestions to the planners and developers of the Park, and that I may be of further service.

Sincerely yours,



John L. Cotter
Curator Emeritus American Historical Archaeology

COMMENTS

RESPONSES

October 13, 1995

Dear Mr. Aikens,

As a volunteer "Historic Interpreter" for Carpenter Hill, I have learned the attraction to visitors are the city, Independence park and the historical buildings that exist in old city. Visitors are amazed and delighted that there buildings still exist, and in the park like atmosphere of Independence Park.

While Independence Hill and the Liberty Bell, as the key to the spirit of the city, I feel it would be a disservice to the rest of Independence Park to centering its attention with an exhibition center as proposed. This would only shorten visiting time and discourage tourism.

I would suggest to consider first what is right about this area, then show on the map or here, rather than build "Disneyland East."



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN NPS-1000-170

D18 (INDE)

January 22, 1996

Mr. William L. Dougherty

Dear Mr. Dougherty:

Thank you for your letter regarding plans for Independence National Historical Park. I appreciate your insights.

The Third Street Visitor Center has served an important role in directing and orienting park visitors over the years. We find, however, that because of its location, only about one third of our visitors make it the first stop during their visit. This means too many people are "oriented" close to or at the end of their visits, causing them to miss the opportunity of learning of about programs or events they might have done or seen in the park and the historic neighborhood. A more central location, close to the point at which most visitors arrive in the district, will mean that most visitors can be served and take better advantage of the many cultural attractions of the area.

Thank you again for your letter.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

COMMENTS

RESPONSES

The visitor center on Third Street is an excellent facility, and with more parking available would serve as an anchor to send visitors to our water front, our Society Hill section, and to Independence Hall and the Liberty Bell. Encouraging vehicular traffic on Chestnut Street would encourage foot traffic and open the area to more family type restaurants. Colonial gardens in all shops and buildings could only add to the character of the area.

These observations come from my conversations with visitors, on their tour of districts of our Old City. I often stress to visitors the importance of our past and its buildings, and I like to say that what they are seeing now is much as it was in the 1700's.

So with this letter I beg you to consider what is right with our beautiful perspective park and historic buildings of Old City and to spend a short walkway here. Yours truly,

Wm. L. Daugherty

COMMENTS

Requesting a vote between your plan and Ed Bacon's plan.
The Birthplace of Democracy deserves this, and notes.

Oct. 18, 1995

Martha Atkins,

I attended the public meeting on October 5th.
hearing for the voice of reason to appear
and it was in Ed Bacon and all the
others in the audience.

I went to the Bryce Building today
and the plan of his is magnificent.

You are making a motion out of
yourself, which is fine
except

The honors your plan to impose is on
property that does not belong to you!!!!

Not one square inch, not one brick

Scram up your own life not someone else's.

If the citizens of the country or city
or county, or 10 randomly selected citizens
were to vote on his plan for you, you
would not get 10%.

The very very least you would do, if
you are an American, is offer the choice
of your plan and Ed Bacon's, and let
Christians decide.

Patti Harris

cc President Clinton
Mayor Rendell
Gov. Robert
Ed Bacon

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
313-315 Walnut Street
Philadelphia, PA 19106

Received DSC-PM
MAY 16 1996

ROUTE 66 SERVICE CENTER	
1. DSC	2. DSC
3. DSC	4. DSC
REMARKS:	
ORIGINAL SENT TO PHS	
AFTER REVIEW, SEND	
ATTACHMENTS TO PHS	

D18 (INDE)

May 1, 1996

Ms. Patti Harris

Dear Ms. Harris:

I have received your letter expressing your concerns regarding the draft General Management Plan for Independence National Historical Park.

It is important that you understand that a comparison of the broad management plan prepared for the park by the National Park Service and the detailed physical design suggested for Independence Mall by Mr. Bacon is one of apples to oranges. Physical design for the mall is just now getting underway, and Mr. Bacon's design, as well as those suggested by many other individuals, will be very carefully considered as we progress.

Please watch for announcements for opportunities to be involved as the work continues.

We thank you for your interest in the long-range planning effort for Independence National Historical Park.

Sincerely,

Martha B. Atkins
Martha B. Atkins
Superintendent

COMMENTS

TO: Martha Aikens
National Park Service
3 Walnut Street
Phila PA 19106

November 3, 1995

CC: Phila Inquirer, Op-Ed Page

Recently I heard a radio program about the plans for the mall, listener comments were solicited to be directed to your office.

Plans for the proposed Constitution Center may be missing the "bigger picture".

Rather than being just a tourist-oriented facility, the Constitution Center could also serve as a "College of Democracy" to help other countries build successful democracies.

The Liberty Bell and Independence Hall are important symbols of our nation's formation. But, the development and success of our democracy are more closely linked to the Constitution, Bill of Rights and other Amendments which structured our system of government. By focusing only on the tourism aspects, we may miss the opportunity to make the new center a World-Class facility.

Amid times of emerging democracies, the focus and mission of the Center should be more than a museum. It could be the nucleus of a teaching curriculum for other countries to learn how the democratic principles developed here, and how they can be put into practice in their own country. Periodic conferences, seminars and debates, perhaps mentored by local universities and financial institutions, could contribute to the learning experience.

The re-design of the mall opens the opportunity to make the new Center not only a tourist draw but also a Center of Democratic Learning for those countries striving to build their own democratic systems.

Thank you,




RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY, PLEASE REFER TO:

D18 (INDEX)

January 22, 1996

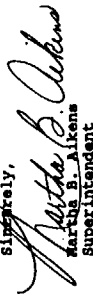
Mr. Paul C. Heymann



Dear Mr. Heymann:

I have received your letter describing your thoughts on the National Constitution Center (NCC). Please understand that while the NCC will be developed privately, the National Park Service supports its aims and hopes that it will be constructed within Independence National Historical Park. Your concerns are apt, and I have forwarded a copy of your letter to the director of the NCC.

Sincerely,



Martha B. Aikens
Superintendent

COMMENTS

RESPONSES

Dear Ms. Aikens
 I have heard both interviews - with you & with Ed Bacon re. Independence Mall - and have read about & viewed the proposals of Mr. Bacon, and I must say, his plan is exciting & of enduring value, both aesthetically, historically, recreationally and educationally - it inspired pride & hope in America's values & future. Mary S. Huhn



United States Department of the Interior
 NATIONAL PARK SERVICE
 Independence National Historical Park
 3113 Walnut Street
 Philadelphia, PA 19106

D18 (INDE)

December 11, 1995

Ms. Mary Huhn

Dear Ms. Huhn:

Thank you for writing to me with your thoughts about the General Management Plan for Independence National Historical Park. We, too, wish to inspire pride and hope in America's future. I have enclosed a synopsis of the National Park Service's proposal for the park for your information, so that you may understand how we hope to achieve that.

You will note that unlike Mr. Bacon's recent drawings and model, this is a management plan for the entire park, rather than a detailed physical design for Independence Mall. Management planning that leads to agreement on goals and objectives is the first step in developing a future for a park, and we are just completing this now. We hope to begin the subsequent step - detailed physical design - next year. I trust that you will follow along as that process unfolds and that you will find the result to be of value.

Sincerely,

 Martha S. Aikens
 Superintendent

Enclosure

COMMENTS

Martha B. Aikens, Superintendent
Independence National Historical Park
311-313 Walnut Street
Philadelphia PA. 19106

Dear Madam:

In general, the draft General Management Plan is excellent. It does not, if implemented, promise to make Philadelphia the Disney World of historical tourism, but that is not the Park's purpose.

I offer these comments:

A. Please have someone translate the Summary and Vision Statement into English. This incomprehensible jargon is infuriating.

B. Page 82 Visitor Experience. I have no objection to more fully taking advantage of the historic and multicultural resources of the surrounding neighborhood, I guess (I'm not sure I know what the hell "multicultural resources" are). It seems to me that if the five primary themes are fully and accurately presented, the role of ethnic and religious minorities will be fully addressed.

I support the Visitor Center proposed for the Mall. However, I do not think any Visitor Center will ever attract as many as half our visitors. I think we can let visitors to the cradle of liberty refuse to do what the Park Service thinks they should do.

I strongly support the Independence Institute. It's 40 years late, but better late than never. However, the concept needs work. It sounds like the park expects free help to do what it has been assigned to do. This won't happen. What is needed is a mechanism for coordinating the research and interpretive efforts of Philadelphia's historical community. If the Park doesn't take the lead, this won't happen.

C. Page 53, Park Identity. The only people who give a damn about who manages what are the managers. Consistent and uniform signs which make clear that visitors are welcome, and spell out hours and admission fees are essential. Then if NPS wants to add a small arrowhead, fine.

An integrated approach to interpreting the district as a whole would certainly benefit the visitor, but who cares about him? The Park will have to take the lead, and be very diplomatic about it.

D. Page 84, 1. Add "and its environs" to the first sentence.

NOV 18 1995

November 8 1995



U.S. DEPARTMENT OF THE INTERIOR

United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

RESPONSES

D18 (IMDS)

January 22, 1996

Mr. David A. Kimball

Dear Mr. Kimball:

Thanks for your letter on the draft General Management Plan for Independence National Historical Park. I appreciate your insights, coming as they do from someone with a long association with the park. Let me respond to several of your points, for the purpose of clarification.

The underground parking garage is not in perfect condition, yet working in cooperation with the Philadelphia Parking Authority, the National Park Service hopes to improve its appearance and to add direct connections to the proposed visitor center.

A number of people have expressed concern over the possibility of a maintenance facility on Independence Mall. We believe that the mall is precisely the place for such a facility: it would be short-sighted of us to fail to provide for services of the extensive amount of development proposed on the mall. You seem to have inferred a "shed," yet we don't yet know what sort of form the facility might take. I can assure you that no stand alone building would be seen by users of the mall or people driving by on adjacent streets. The precise design treatment, location, size, and configuration of the facility would be determined in future design studies, and shared with the public at that time.

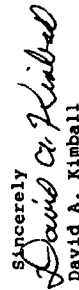
I am intrigued by your suggestion of an exhibit on Judge Lewis. We will consider it when more detailed planning for the proposed visitor center occurs.

With staff reductions and increasing operational responsibilities, it is not practical for the park to keep Independence Hall open on a 24-hour basis. In addition, there has never been any demand for round-the-clock access: most visitors are here between 10:00 am and 3:00 pm, and these are precisely the hours at which overcrowding occurs. A reservation system will spread out the peak

COMMENTS

2. Circulation. Elsewhere, the garage under the mall is said to be spalling and dank. Here, all visitors are to be directed to it. This will insure a lousy first impression. Am I missing something?
3. Independence Mall. The only time the second block has worked was when the temporary canopy was up in 1987. Some sort of light cover to protect from rain and provide shade is desirable. Restrooms are essential. And if no other part of the plan is implemented, those colonnades should be bulldozed!
- E. Page 85 1. I agree that the mall is no place for a maintenance shed. How about space in the VC, or renting, or the garage, or the mint or Federal Building?
2. Independence Park Institute. Great, but in Merchants' Exchange or present VC.
3. National Constitution Center. It is my understanding that the Center was authorized to further public interest in and understanding of the U.S. Constitution. A museum, whether in Philadelphia, Washington or Podunk, is the least cost-effective possible way to do this. Moreover I don't think it will work. How has the public reacted to "Promise Of Permanency"? The "Miracle" exhibit drew considerable interest, but used original documents which cannot be used for long-term display. However, if built with donated funds, it will eventually solve your maintenance space and curatorial storage problems.
- F. Page 86. I suggest a small but prominently located exhibit on Judge Lewis be placed in the new VC.
- G. Other
1. If paperwork expands to fill the time available. Central office staff expands to fill the space available. The Philadelphia Exchange should be used for the Institute or put under lease for use as an exchange, or for restaurants and shops or some other appropriate use.
 2. I find a reservation system for Independence Hall totally contrary to everything the building stands for. Scrap the tour system, keep it open 24 hours (if we can't afford it, it's pointless to preserve the building), but NO reservations!
 3. I understand the desire to find a use for the present VC. However, avoid using it just because it's there.
 4. We have a bell, personally presented by the Head Of State of an old ally who is alive and alert. Is a curatorial warehouse an appropriate setting for it?
 5. Ed Bacon is the best city planner of this generation. However, a park and its resources are not the same as a city. I enclose a copy of a letter giving my views on the Bacon plan.

Sincerely



David A. Kimball

RESPONSES

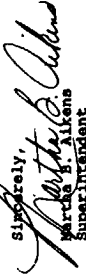
2

deand and allow more leisurely and contemplative visits. In addition, it once again may be possible to allow early morning and late afternoon visitors the freedom to enter the building without joining a tour.

While the Third Street Visitor Center would house curatorial activities and park museum storage and study collections, it is also intended to display part of the collection, and a small visitor orientation area will be retained in the area that is currently the bookstore. As an area of display, it is most appropriate to maintain the current location of the Bicentennial Bell.

Thanks again for your thoughts.

Sincerely,


Wade S. Aikens
Superintendent

COMMENTS

JOHN LAWSON ARCHITECTS

20 November 1995

Mr. Roger Kennedy, Director
National Park Service
United States Department of the Interior
P.O. Box 37127
Washington, D.C. 20013-7127

Re: Independence National Historical Park CMP / Liberty Bell Pavilion

Dear Mr. Kennedy:

As a member of the Philadelphia Chapter of the American Institute of Architects' task force which analyzed the Draft General Management Plan and Environmental Impact Statement for INHP, we gave careful consideration to the many interesting yet complex urban design and planning issues which are raised by the management plan.

However, I am writing this letter specifically to encourage the National Park Service to maintain the existing Liberty Bell Pavilion as part of the development of *Alternative E*. The Preferred Alternative, rather than requiring that a new pavilion be built. Your stated needs for improvement of the visitor experience, preservation, and protection of the Bell mentioned on page 85 of the CMP, can all be addressed without assuming that the existing structure must be replaced, relocated, or rebuilt.

As you may recall, from our participation in the September 1994 WHYTV televised town meeting for INHP, I was the partner at Mitchell/Giurgola Architects in charge of both the Liberty Bell Pavilion and the INHP Maintenance Facilities. Consequently, I feel personally involved with the rational approach to the buildings' planning, layout, and construction. The design of these facilities was led by AIA Gold Medalist Romaldo Giurgola, an architect of international stature whose firm began in Philadelphia, and whose built works should be treasured by Philadelphians, rather than casually dismissed as the Pavilion is today by the Philadelphia Inquirer.

Sincerely,

John Q. Lawson

John Q. Lawson FAIA

John Q. Lawson FAIA
Lorna Reiss AIA
Rollie R. La France AIA

cc: David Hollenberg
Deirdre Gibson

RESPONSES



United States Department of the Interior
NATIONAL PARK SERVICE
Northeast Field Area
U. S. Custom House
200 Chestnut Street
Philadelphia, Pennsylvania 19106

January 25, 1996

(PDO.B-INDS)

Mr. John Lawson
John Lawson Architects

Dear Mr. Lawson:

Thank you for your letter regarding the Liberty Bell Pavilion at Independence National Historical Park. Director Roger Kennedy has shared it with me and asked me to reply to your concern.

The design of the existing pavilion masterfully addressed each criterion that was set for it in the early 1970's. Some circumstances have changed since then, however, including an increase in visitation and the length of waits--sometimes in poor weather; threats to the Bell due to its proximity to a public street; and a revision in approach to interpreting the Bell. In addition, the full southern exposure that allows such a wonderful view of Independence Hall also has made it difficult to achieve proper environmental control in the interior of the building.

The language of the General Management Plan allows us to consider modifying or replacing the building, but does not commit us to do so. We certainly are cognizant of the thoughtfulness of approach used by the original design team. If a decision is made to move ahead, we will want to be fully apprised of the ways in which you developed the original concept and design for the pavilion.

Sincerely,

Marie Rust
Field Director

COMMENTS

MRS. GRAHAM A. MARX,

10/30/95
Dear Mr. Gibson
Both my husband & I hope that the
National Historical Park Service will fully
support Brown's Design Foundation and
contribute to the preservation of the
American public associations, the
Liberty Bell, Independence Hall, etc.
If you can help, the foundation
is to send directly to the American Museum

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
911-915 Walnut Street
Philadelphia, PA 19106

IN EARLY 1972 TO:

(2001) 810


December 11, 1995

Mrs. Graham A. Marx

Dear Mrs. Marx:

Thank you for your recent note regarding Independence Hall. I enclose a synopsis of the National Park Service's proposal for all of Independence National Historical Park, for your information and use. I assure you that I share your pride in the magnificent resources of the park. We have worked with the public for two years to develop a plan that reflects our shared pride and protects and promotes the resources.

Sincerely,

Sincerely,

 Martha B. Atkins
 Superintendent
 Enclosure

Enclosure

COMMENTS

October 8th/95

Ms. Martha Aikens, Superintendent,
Independence National Historical Park
313 Walnut Street
Philadelphia PA 19106

Dear Martha:

This week the Inquirer diagrammed a version of the General Management Plan which noted that Chestnut Street would be closed to all traffic from 5th to 6th streets. I am appalled!

This version of the plan would be a disaster to Society Hill unless it includes a complete rerouting of traffic to avoid dumping all eastbound traffic on either Pine or South streets which are both overburdened at present.

As you know I have attended most public sessions for the consideration of neighborhood, and other concerns about the General Management Plan. I recall a suggestion that Chestnut street be depressed several feet below grade and a pedestrian bridge elevated several above grade to accommodate a safe flow of vehicular and pedestrian traffic in this block. That would work! Closing vehicular traffic will not!

I will strongly suggest to the Society Hill Civic Association and all interested parties that closing the 500 block of Chestnut street to vehicles would or will be a disastrous mistake. I urge your disavowal of any such plan!

Sincerely=

Richard W. Ostrander
cc/Ms. Melodie Rust, Regional Director, NPS
Mel Buckman, President, SHCA
Mayor Ed Rendell
Congressman Thomas Foglietta
All adjacent Civic Associations and other
interested parties

Richard W. Ostrander

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

BY MAIL RETURN TO:

D18 (INDE)

December 11, 1995

Mr. Richard Ostrander

Dear Dick:

Thanks for your letter regarding the General Management Plan for Independence National Historical Park. I also have received letters from Mel Buckman describing the Society Hill Civic Association's position, and I appreciate your concern over the potential impact to Society Hill of the proposed closing of the 500 block of Chestnut Street.

We will work with the City of Philadelphia to further study the impacts and possible solutions that will work for everyone. As you may realize, a final decision on this proposal is the responsibility of the city, and not of the National Park Service. While my first responsibility is the safety of visitors and the protection of the park's fragile historic resources, the park will continue to be a good neighbor.

I am grateful for your ongoing support and interest in the park and will work with you to resolve this concern.

Sincerely,

Martha Aikens
Martha Aikens
Superintendent

COMMENTS

Martha Aikens, Superintendent
National Park Service
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

November 16, 1995

Dear Ms. Aikens,

I enclose for your perusal my letter which recently appeared in the Philadelphia Inquirer (November 4, 1995). I would like to take this opportunity to be slightly more specific in my appraisal of your draft General Management Plan.

To begin with, I strongly disagree with the "preferred" scheme's placement of the proposed visitor's center on the middle block, as this placement forces a choice of movement. The plan is too vague in its limited discussion of how visitors will arrive and be directed to the various elements which constitute the Mall and surrounding Park sites. The layout need not "coerce" visitors to move in a certain pattern, yet there should be a natural, logical progression of movement.

I would like to see the visitor's center in the third block, with the bus drop-off there. The proposed Constitution Center would be situated in the second block, followed by the Liberty Bell and finally, the sequence culminates at Independence Hall. This progression from "welcome" (Visitor's Center) to "modern interpretation" (Constitution Center) to "symbol" (Liberty Bell) to "historical site/event" (Independence Hall) is both logical and powerful.

Secondly, the plan, while perhaps perfectly sufficient for any (?) other National Park, fails to exploit the exciting potential of this unique historical site in the larger context of the city of Philadelphia. The vision for the Park, as stated in the Plan, sounds inspiring enough; however, that inspiration is not manifest in the actual plan, most notably the third role of the Park as an "active partner in the life of the community." This relationship should refer not only to the immediate neighbors of the Park, but also to the bigger traffic patterns (both pedestrian and vehicular) through the city. I urge you to reacquaint yourselves with the Big Picture. Develop a vision of the Mall which recognizes the site's inherent magnetism which, by its nature, will attract excitement and support.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY REFER TO

D18 (INDE)

January 22, 1996

Ms. Lis Price

Dear Ms. Price:

Thank you for your letter regarding the General Management Plan (GMP) for Independence National Historical Park.

The preferred alternative's positioning of the proposed visitor center in a central location is specifically intended to allow, rather than to "force" a choice for visitors. In an urban historic district with many entrances, circulation systems, pathways, and fine resources and attractions, there is no "logical progression of movement."

The preferred alternative is based on our experience in over 300 units of the National Park System: most visitors will arrive at the proposed visitor center, become oriented and excited about the remarkable number of possibilities the city holds, and make their own informed choices about itineraries. While it is possible that specific visitor flows can be programmed within interior spaces, such as museums, we reject the notion that people can be choreographed in a setting as large, rich and diverse as a city.

The new visitor center, which ultimately may be programmed, designed, and funded through local private and public partners, is one tangible expression of the park's role in the life of the community. A key purpose of the new center is better orientation for visitors in the opportunities that are available to them beyond the park. Additional potential partnerships include the National Constitution Center, the Independence Park Institute, new initiatives with the city, and others that will be implemented over many years. The function of the GMP is not to detail such initiatives, but rather to set a framework that makes them possible.

The public comment period that closed on November 20, 1995 is one of a number of open periods related to the GMP, which is a broad management outline, and not a detailed physical plan. Because the alternatives were originally presented for public comment in

COMMENTS

Finally, let me reiterate my belief that it is absurd to close the "public comment period" before the public has had the opportunity to view actual plans and models to be produced in the design phase.

It is always easy to criticize someone else's work. I am certain that you and your staff have worked hard on this. Thank you for your continued efforts on this project, which promises to be such an asset to all of Philadelphia.

Very truly yours,

Liz Price

Liz Price

RESPONSES

2

September 1994, presented in a revised version in January 1995, and again in August 1995, there can be no doubt that there has been adequate time for the public to review, discuss and comment on them. Another comment period will open in this spring after the final GAP is published and distributed.

We hope that a design process will be initiated in this year, and if so, there will be ample opportunity for you to view and comment on the detailed plans and models that are appropriate to a design process. I hope that you will want to participate.

Sincerely,

Martha B. Atkins

Martha B. Atkins
Superintendent
Independence National Historical
Park

COMMENTS

RESPONSES

2

Comparison of any management plan to a design is a comparison of apples to oranges. I have enclosed a copy of the GMP and of a newsletter that summarizes the proposed management plan for your use in evaluating the work that NPS has done.

Our physical design process will begin in the spring as the GMP is completed, and will be open to the public, just as the GMP process has been. Mr. Bacon's proposal and those of many others will be fully considered at that time. I would be pleased if you yourself would participate.

Sincerely,

Martha B. Atkins
Martha B. Atkins
Superintendent

enclosures (2)

cc: Eileen Woodford, Executive Director
National Park Conservation Association

RESPONSES



NATIONAL PARK SERVICE
Independence National Historical Park
511-319 Walnut Street
Philadelphia, PA 19106

D18 (IND8)

January 22, 1996

Ms. Robyn Selvin
Address Unknown

Dear Ms. Solvin:

I am sorry that I was unable to send you a timely response to your letter regarding the General Management Plan for Independence National Historical Park; no return address was included with your letter, and your telephone number is unlisted. I hope that you will see this letter when it is printed with the Final General Management Plan and Environmental Impact Statement.

As you may have noted if you heard the entire "Radio Times" broadcast, or if you viewed either letters and responses in this issue, Mr. Bacon has been very forthcoming. Mr. Bacon gave me a copy of his letter to the National Park Service (NPS) and the National Park Service's reply. Mr. Bacon is concerned with issues of physical design, aesthetics, and management. He is also concerned with the park's mission, goals, and role in the nation and the community. It is a broad management guideline. Agreement on goals and objectives is the first step in developing a future for a park, and we are just completing this now. We hope to begin the subsequent step - detailed physical design - this year.

The CMP was initiated two years ago, and has been prepared with the aid of planners, historians, architects, educators and many others, not only employed by the National Park Service but also hundreds of volunteers who participated in 14 public workshops and several meetings.

six alternative management plans for the park first were presented in September 1984. They were revised based on public comment and sent back to the public again in January 1985. After additional revision based on public comment, a third set of management plans was presented in March 1985. A fourth set of management plans was presented in May 1985. The NPS has revised the management plans several times since November 1985. We have reviewed the substantial amount of public comments that came in and revised our proposal into a final management plan. After we present it to the public, there will be an additional public comment period. I think the public has had sufficient time to comment as the plan has developed and am delighted that so many citizens availed themselves of the opportunity.

to the city, always, remembering that they had a responsibility to "give back" to our God and in blessed thank.

Work still continues on road, I wish you to please
remember your plan for this school that I recently
wrote. I have on the night I will work on it
and that the design will be best for the
village previous the building of the city.

Well, how that the Providence works on the brains of creatures no other mind has. The reason did nothing unless something on the reeling goal, together, no given way of action. Given that Providence, no I and I and the other day

[illegible]

October 25, 1995

Dear Mr Atkins:

I am writing to tell you I agree the historical Park Service management plan for Independence Hall and I support the Service's alternative.

I know you probably enjoy me at the
Bacon bag now... I heard him on the T. in a
jazz band he is certainly enjoy me at the...
but I hope on my last that this will some way
I & George will work together for the good of
the world.

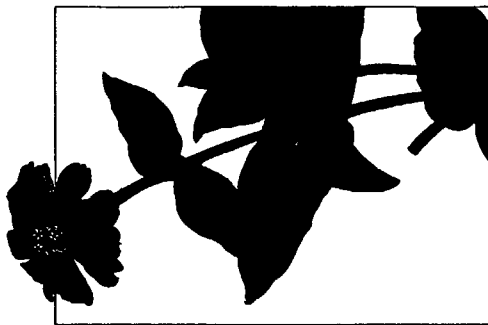
Mr. Atkins, my dad's young man, England
Burkhead who came here in the 1850's (they
settled in Philadelphia and came here in 1860 in
Cleveland and Burlington artists.) The young
man, they first in 1864 and 1865 and so on
and then he came here in the Philadelphia.
was a real old man, they made many contributions

COMMENTS

Please consider your plan.

Lincoln, N.J.
Edw. Selvin
Robt. Selvin
Haddon Twp, N.J.

Zinnia elegans
From the Jardines, universos y maravillas, Pers. Antea, Libanos, 1836.
 Courtesy of Hunt Institute for Botanical Documentation,
 Carnegie Mellon University, Pittsburgh, PA
 Published by Culture Seeds, 36 West 44th Street, New York, NY 10036
 27650159
 Printed in Hong Kong



themselves of the opportunity to be meaningfully involved. I trust that you will follow along as that process unfolds and that you will find the result to be of value.

Mr. Bacon's comments on the absence of physical design, as you see, have been premature. A physical design process will begin in this year as the GAP is completed, and will be open to the public, just as the GEP process has been. Mr. Bacon's proposal and those of many others will be fully considered at that time. I would be pleased if you would participate.

Sincerely,

Martha B. Atkins
Superintendent

COMMENTS

Evelyn Swimmer

October 28, 1995

Martha Aikens
Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

Dear Ms. Aikens:

As I watch and participate in the planning process for the Draft General Management Plan, I am amazed that we refuse to learn from history. Numerous historic and beautiful buildings were destroyed to create the mall setting for Independence Hall because a "proper setting" was deemed necessary. Now the mall and specifically the third block is an "endangered space" and a designed landscape at risk.

Daniel Kiley, ASLA, was asked to design the third block and he created an elegant urban park for the city of Philadelphia. Through years of poor maintenance and general negligence the block became both unsafe and unattractive. The solution is now to demolish it for what is believed to be a better use of the land. Philadelphia is about to lose an important open space.

Central Park in New York City has always been faced with well intentioned ideas and funding sources for "improvements" in the park. The great space only remains today because of the efforts of individuals who understand the value of that space for the city.

In the past month the two enclosed articles came to my attention because they are relevant to the ongoing debate over the future of Independence National Historical Park. As we reach the 21st Century, Mr. Kiley is being recognized as one the leading 20th Century landscape architects while at the same time Philadelphia and the National Park Service are recommending to demolish the only work of his in our city.

It is discouraging to see the National Park Service placed in a position of yielding to powers that are focused on short term solutions to age old problems. Political pressures who are forcing the National Park Service to solve the problems associated with the city of Philadelphia are misguided. The park with its magnificent buildings, well maintained property, excellent security, and educational opportunities is certainly the city's top tourist attraction.

I urge the decision makers to consider how they will be judged two hundred years from now by those citizens who will wonder why so many of the city's important buildings and spaces were so undervalued while they existed.

Sincerely,


Evelyn Swimmer, ASLA

Enclosures

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY, PLEASE REFER TO:

D18 (INDE)

January 22, 1996

Ms. Evelyn Swimmer

Dear Ms. Swimmer:

Thank you for your letter regarding changes to Independence Mall. Please let me clarify some of the points you have made.

A recent Cultural Landscape Report, written by one of your colleagues, and approved by the Coordinator of the Historic Landscape Initiative of the National Park Service and the State Historic Preservation Officer of Pennsylvania, found that the third block of the mall was not, in fact, one of Daniel Kiley's significant works of design. Please refer to the document for a full discussion of this finding.

Mr. Kiley himself repudiated the design before the working drawings were completed, having become frustrated over what he regarded as interference and cost cutting from the Commonwealth, his client. A local landscape architect was then hired to complete the design and oversee construction.

The block failed not through poor maintenance, but because the design was ill-suited for a place where there are few or no pedestrians. There is nothing there or in the surrounding blocks to attract people and remove the sense that it is deserted. In addition, Kiley provided no construction details, and the trees were planted in a substrate of debris contained in the basements of the buildings that had been demolished. The construction supervisor likened this to "planting trees in a swimming pool." Starved for oxygen, the tree roots concentrated in the layer of sand laid just under the paving bricks, popping thousands of bricks and leading to numerous tripping accidents and a number of suits against the federal government. Twenty years after construction, when difficult budget times came, as they inevitably do, this dangerous block, repudiated by the public, was closed.

COMMENTS

Preserving Contemporary Landscape Architecture:
Is Nothing Permanent but Change Itself

Charles A. Birnbaum, ASLA
Coordinator, Historic Landscape Initiative
National Park Service, Preservation Assistance Division
Washington, DC

We live in a world whose advances are based on the continuous expansion of the field of scientific method. Beyond those fields of science, such as physics and sociology, the scientific method is a process which takes nothing for granted, accepts no precedents without examination, and recognizes a dynamic world in which nothing is permanent but change itself.

Carroll Eddow, *Landscape for Living* (1990)

When we think of the treatment of historic landscapes, we often think about the preservation of the works of Frederick Law Olmsted, Sr., Jens Jensen, or Beatrix Farrand to name three well-known pioneers of the profession. When we consider the contributions of contemporary visionaries such as Lawrence Halprin, Dan Kiley, James Rose, or Hideo Sasaki, we don't often think of these landscapes as historic resources requiring special protection. Think again.

It was not too long ago that the first printing of Norman T. Newton's *Design on the Land* (1971) included a perspective rendering of the "outstanding design" for Copley Square by Sasaki Associates (1966) with the caption, "the famous Copley Square redesigned at last." It's ironic that Newton's book can still be found on bookstore shelves, while the redesigned Copley Square has since seen another design competition (1983) and complete reconstruction (1989).

During a recent conversation between A. E. Bye, FASLA, and Lawrence Halprin, FASLA, Bye recalls "Larry stated that we spend thirty to forty years trying to get our projects built, and then the next ten to twenty years trying to make

sure that they don't get knocked down." When discussing this situation with Halprin, his frustrations are immediately evident. He states, "If a painting or sculpture is purchased, it is safe to assume that they will be respected. A house or landscape, however, may be brought down."

At the time of the writing of this article, a substantial number of landscapes from the recent past are currently at risk or have recently been substantially altered. These include residential designs by A. E. Bye (Callesway Farms, Lexington, Kentucky), James Rose (James Rose House, Ridgewood, New Jersey) and Jane Platt (Jane Platt Garden, Portland, Oregon); streetscapes, squares and plazas by Dan Kiley (Independence Mall, Philadelphia, Pennsylvania; Burr Sculpture Court, Hartford, Connecticut); and Lawrence Halprin (Nicollet Mall, Minneapolis, Minnesota; Embarcadero Fountain, San Francisco, California); nearly all of the shopping center designs by Louise Shellhorn (Bullock Wilshire, Pasadena, California; Sherman Oaks, San Fernando Valley, California); parks by Richard Haag and Jones and Jones (Occidental Park, Seattle, Washington) and Dan Kiley (Jefferson National Expansion Memorial/Gateway Arch Memorial Landscapes, St. Louis, Missouri); campus plans by Dan Kiley (Concordia Junior College, Fort Wayne, Indiana; US Air Force Academy at Colorado Springs, Colorado); zoos by Clarke and Rapuano (Central Park Zoo, New York City) and William C. Paulay (Great Park Zoo, Atlanta, Georgia); and reproduction grounds by Clarence & Rapuano (New York World's Fair, now Flushing Meadows Corona Park) and Richard Haag (1962 Seattle World's Fair, now Seattle Center).

III - 101

Preserving the Natural Past



RESPONSES

2

The question for a landscape architect such as yourself is whether public funds must be committed indefinitely to sustaining poorly conceived landscapes that do not work and that have no constituency. A work of art on paper can simply be removed from a museum's wall and archived, if no one cares to see it. A large landscape requires hundreds of thousands of dollars each year in simple maintenance, whether it is used or not. Different criteria for sustainability must apply to landscapes, and it would have been well if they had applied at the time of design.

"Solving the city's problems" is not part of the National Park Service's agenda for Independence Mall. The Mall will be redesigned to work for visitors as well as residents, to take pressure off the more sensitive historic core of the park and the surrounding historic district, and to be a lively, engaging space, as public parks ought to be. And it will continue to consist overwhelmingly of open space.

Sincerely,

Martha B. Aikens
Superintendent

RESPONSES

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In many contemporary landscape architectural projects in urban areas, signature plant materials, lighting and furnishings are often altered without consideration to the original design intent. Recently, at Lincoln Center, New York City, New York, historic Sycamore trees which were planted in groups of four were replaced with single Bradford Pearls. (Historic photo courtesy of the Office of Dan Kiley)

According to Lawrence Halprin, "the ideal situation is when we can remain involved." Fortunately, return requests have been the case for Halprin at Portland's Auditorium Forecourt Fountain and for Kiley at the Art Institute of Chicago - the latter representing a thirty-year association. According to Mary Hughes, ASLA, there is often an issue of "institutional memory." Hughes is the Regional Historic Landscape Architect, National Park Service, Midwest Region who intervened when maintenance-driven alterations were proposed for the landscape of the Gateway Arch, St. Louis, Missouri. She states:

The degree to which the landscape design was integral to the overall concept of the Memorial evolved over almost twenty years of close collaboration between Saarinen and Kiley. This had dropped out of institutional memory because Kiley's role had not been mentioned in previous historical accounts of the Arch construction. For Kiley, the Memorial's precedent figure in contemporary landscape architecture is well established by this point in time, the historical significance of the Arch landscape rested on resolving the question of the landscape's integrity, or the ability of the existing landscape to reflect the essential qualities of the original design."

Integrity is defined by the National Register of Historic Places as "the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic period."¹ Therefore, if features that are critical to the overall significance of the design are removed or altered, the integrity of the design will most

likely be compromised. To illustrate this point, one can refer to the removal of native bank plantings and their replacement with a mown lawn at Colby College, Waterville, Maine (design by Carol Johnson Associates); the elimination of symmetrical groupings of London Plane trees that form a bosque and their replacement with solitary Bradford Pear trees at Lincoln Center, New York City (Dan Kiley); eliminating well-established foundation plantings to accommodate new above-ground ventilation ducts at Robson Square, Vancouver, British Columbia (Cornelia Oberlander); unresolved replacement challenges posed by the death of two sentinel California Live Oaks at the Dewey Donnell Ranch, Sonoma, California (Thomas Church); or the recent removal of a fountain designed by Lawrence Halprin for the 1962 Seattle World's Fair and its replacement with a new work of contemporary sculpture on the same location.

Probably the greatest loss has occurred with the redesign and/or enclosure of outdoor regional shopping centers and their associated landscaped spaces between buildings - thus eradicating an important chapter in the profession's evolution from the mid-to-late 1950s through the 1960s. Additionally, although not outright demolition, another uniform scenario in these areas and many other landscape projects of this era has been the "upgrading" of site-specific character-defining pavements, lights and streetscape furnishings that are now difficult to maintain, or are perceived as out of fashion. In the case of the recently altered Nicollet Mall, Lance Necker, ASLA, states, "The mall was an experiment - designed using new, untested

Answering the General Public

COMMENTS

materials that were not durable or appropriate to Minnesota. It became costly to maintain over the long term (for example, the maintenance of the lights alone ran \$100,000 annually). As a formal idea we regret its passing, yet the local group was adamant that it had to change."

Recognizing a variety of limitations and both physical and natural pressures, what are the possibilities for the documentation, evaluation and preservation of this recent, yet important legacy? Based on an analysis of the current situation, the following ideas could be pursued:

1. Pursue Nominations to the National Register for Recent Landscape Architecture. According to National Register Bulletin 22: Guidelines for Evaluating and Nominating Properties That Have Achieved Significance Within the Last Fifty Years:

as a general rule, properties that have achieved significance within the last 50 years are not eligible for National Register listing because the Register is designed to recognize properties of the Nation's historic resources that are worthy of preservation. The National Register does not include properties solely for their contemporary impact and visibility, and it rarely is possible to evaluate historical impact, role, or relative value immediately after an event occurs or a building is constructed. The passage of time is necessary

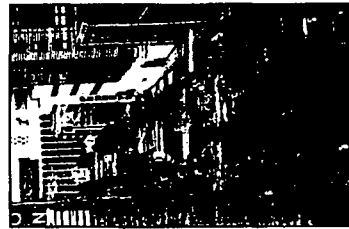


Photo ca. 1970s of Nicollet Mall, Minneapolis, Minnesota soon after its opening. (Courtesy of Laurence Halperin)

Assessing the Rural Road

in order to apply the adjective 'historic' and to ensure adequate perspective."

However, justification for significance has been achieved for a number of modern architectural examples - in fact, there are nearly one thousand buildings on the National Register that fit this category. One such example is the Whitney Museum of American Art in New York City, constructed between 1963 and 1966. The nomination states that the Whitney "is of exceptional significance as the work of an internationally acclaimed master, Marcel Breuer, whose work had a profound influence on the course of American architecture and as a representative of the Expressionist movement in modern American architecture during the 1950s and 1960s." Within this established framework, one could easily consider landscape architectural works of this movement and nominate them with sufficient context.

2. Establish a Greater Context for Contemporary Landscape Architecture. This will be necessary to achieve Idea 1 presented above; however difficult this may be, there is already momentum established. In the past few years, there has been a dramatic increase in scholarly works with a focus on recent landscape architectural history. Examples include Marc Treib's *Modern Landscape Architecture: A Critical Review* (1993), Dorothee Imbert's *The Modernist Garden in France* (1993) and Felice Frankel and Jory Johnson's *Modern Landscape Architecture: Redefining the Garden* (1991) with many more on the immediate horizon. Other invaluable forms of contextual history are contained in thematic issues of *Process Architecture* - each written by the designer. Dedicated issues have contained the works of Garrett Eckbo, Paul Friedberg, Dan Kiley, SWA, Peter Walker and Robert Zion.

Finally, oral histories should be carried out with significant designers. For example, over the past few years the Hubbard Trust has funded oral histories of Gilmore Clarke Garrett Eckbo, Norman Newton, Arthur A. Shurcliffe, and Charles Elliot II, Pennsylvania State University has videotaped interviews with several John R. Braden Fellows and Lecturers including A.E. Bye, Ian McHarg, Roberto Burle Marx, Rodrick Nash, Sir Geoffrey Jellicoe, and John Simonds, and the University of California Regional Oral History Office. Bancroft Library has undertaken oral history for California figures such as Thomas Church.

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Recent photo of the Nicollet Mall, Minneapolis, Minnesota, with new permanent and furnishings. (Photo courtesy of the author)

RESPONSES

3. Document Threatened Work. For master-works in particular, those landscapes should be documented, especially if they are threatened with change. This would have been extremely useful for Nicollet Mall, especially since no "as-built" plans are known to exist.

Another example that is at current risk is Galtway Farm, Lexington, Kentucky. Considered by many to be one of A.E. Bye's most significant works (executed 1974-1982) it has recently been sold. Upon hearing rumors of redesign to include new fences and alterations to character-defining topography and plantings, Bye made a site visit to meet with the new owners. According to Bye, they "did not have a meeting of the minds." Like many Bye designs there are no project drawings generated by his office (other than those produced for publications that followed). Should local American Society of Landscape Architects (ASLA) chapters, academic institutions, and State Historic Preservation Offices be involved? During a recent conversation, ASLA Kentucky Chapter President, Patrick Hoagland of Lexington, said, "The local ASLA chapter is doing nothing. We didn't know that Galtway was sold."

The Historic American Building Survey (HABS) contains no documentation of modern works other than what is contained in associated project photography, but this is about to change. HABS is negotiating with the American Institute of Architects (AIA), which has established a HABS advisory board. According to Paul Dolinsky, HABS Chief, "When a building receives a 25 year award from the AIA, as part of this recognition, the original architects'

drawings would be submitted to HABS and the as-builts would become a part of the HABS collection." If landscape architectural accomplishments were to consider a similar recognition, they, too, could be put on mylar and accessioned into the permanent collection at the Library of Congress.

4. Consult with the Original Designer. When possible, Carol Johnson, FASLA, points out that a continuum of design can often provide many advantages. She suggests that the original landscape architect could "come at it with an informed approach - complete with an understanding of what people were like then and now, coupled with a knowledge of the history of the landscape in both detail and how it evolved." This information would surely prove useful at Dulles Airport where EDAA, Inc., is consulting on an expansion planning project that includes visual and design evaluations. According to project manager Richard Dorrier, "We are looking at how various options of development would affect the aesthetics." To date, the original landscape architect Dan Kiley has not been brought in.

For Halprin, who has been recently called back at the Auditorium Forecourt Fountain, Portland, Oregon, many questions need to be asked. Here Halprin has recently consulted on issues of maintenance, lighting, and the perimeter trees that have matured to such a degree "that views into this much beloved space are no longer possible." In revisiting his design, Halprin queries "where does history stop and how far back do you go?" He also recognizes that

Assessing the Record Book

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"...sometimes things need to be changed and a new society or series of events warrant new design." This philosophical framework has had an immediate impact on establishing the design intent for this rehabilitation project.

5. Educate Owners and Public Stewards. As a profession, at all levels we should strive to educate public municipalities and private residential owners of the significance of these properties. This is precisely what Dean Cardasis, ASLA, University of Amherst, and Rose House, as well as for his extant legacy of residential designs. Today Rose's house in Ridgewood, New Jersey, is owned by a not-for-profit organization. The challenge for this group is to arrest the further deterioration of a property that evolved in accordance with Rose's own design philosophies between 1953 and 1980, started to decay thereafter, and is presently in a state of great disrepair. The fruits of these labors have already been evidenced through a partnership with the Garden Conservancy, academic support, local sponsorship and assistance from other homeowners of James Rose landscapes, the latter now having a greater interest in their own landscapes.

6. Establish Creative Partnerships. Antonia Aulizio, Executive Director of the Garden



The future of Arthur Edwin Bye's design at Gainesway Farms, Lexington, Kentucky, is uncertain. Locally, there has been no discussion between landscape architectural professionals and the current owners. (Photo courtesy of A. E. Bye)

Approaching the Round Road

Conservancy, suggests that "a lot of what we do is association." Formed in 1989, the Conservancy has assisted a number of owners and interested community groups. Part of its mission is to "preserve fine gardens beyond the mortality of their creators and their ephemeral nature, to fortify the gardener's artistic vision so that it may be shared with generations of gardeners yet to come." This includes horticultural management to support and reinforce the original design intent, as well as legal, financial and administrative expertise to meet the challenges of transferring a garden from private to public ownership and ensuring its continuing existence and integrity. The Conservancy also assists in the planning process, developing horticultural management plans, setting an endowment and creating fund-raising strategies to ensure a garden's financial future, and forming or strengthening local support.

One such recent example of the Conservancy's efforts has been its involvement with Jane Platt's garden in Portland, Oregon. Platt's garden has been well-known in horticultural circles for many years, but the future of this garden following her death three years ago had been uncertain. Current initiatives have developed a management plan and enlisted the support of the local garden club, whose members have pitched in to assist in the maintenance of what Adezlo refers to as a "very personal garden." As a result of this quasi-public partnership, the garden is now being preserved and is open to the public.

7. Ensure Proper Homes for Archives. Finding a home for a landscape architect's archives can be as challenging as convincing a practitioner to donate their collections to an institution. The situation over the past few years has improved considerably, with many institutions ready and willing to accept collections that include contemporary works. The University of Pennsylvania, for example, has recently accepted the collections of Lawrence Halprin. George E. Patton and Philip N. Winslow.

8. Utilize Current Standards and Guidelines When Embarking on Project Work. The National Park Service provides technical assistance for registering, nominating, analyzing and treating historic landscapes. Sympathetic applications of these tools and methodologies should be considered and tailored to these unique resources.

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RESPONSES

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RESPONSES

School of Humanities and Social Sciences
Phone: (970) 248-1898
Fax: (970) 248-1934
Department of Sociology and Behavioral Sciences



Ad. Tamera Fabricanda

Superintendent Martha B. Aikens
Independence National Historical Park
311-313 Walnut Street
Philadelphia, Pennsylvania 19106

7 November 1995

Dear Superintendent Aikens:

I have received a copy of the Draft General Management Plan and Environmental Impact Statement for Independence NHP and am pleased with it. As a former resident of Philadelphia, I appreciate the improved "visitor flow" that Alternative E would provide. If enacted, this plan would improve tremendously the accessibility of the park's resources to the visitor. As a practicing historian of colonial America, I support Alternative E because of the improved visitor experience, the preservation of the park's cultural resources, and the development of new facilities and programs to teach American history to the world.

My primary interest in the GMP has been with the interpretive statement and themes. I am particularly happy to see that Sharon Brown and the GMP team incorporated many of my suggestions in this section. For this reason, I can now endorse the interpretive themes as consistent with the dominant current interpretations of these aspects of American history. While you would always find historians that would quibble, I think most would endorse the statement.

Please send me the new interpretive plan for the park. I am returning the larger GMP document, for which you have a greater need. I wish you success in implementing Alternative E as an exciting plan for the future of Independence NHP.

Sincerely yours,

James H. Williams
James H. Williams, Ph.D.
Lecturer in History



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

January 22, 1996

Mr. James H. Williams
School of Humanities and Social Science
Mesa State College
PO Box 2647
Grand Junction, Colorado 81502-2647

Dear Mr. Williams:

Thank you for your letter regarding the General Management Plan for Independence National Historical Park. I appreciate your earlier review of the interpretive themes, as well as your vote of confidence for the plan.

A copy of the Interpretive Media Plan has been sent to you under separate cover.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

COMMENTS

Ms. Martha B. Aikens
Superintendent
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

Dear Ms. Aikens:

I wrote you in 1994 because, while in Philadelphia during my husband's convalescence after a knee operation, I found it difficult to get in to see some of the buildings in the park.

After receiving your many letters telling us about the plans for the future of the park, I am really ashamed that I was so surly!

I have been unable to attend any of the meetings or seminars you have held since I am working here in France full time. But I have been interested in the plans, and I want to thank you for keeping me informed. I used to live in Yardley many years ago, and I was and am very fond of Pennsylvania. It is good to see that people like you are in charge of its future. I'll be returning to the United States later this year and hope to have the chance to visit Philadelphia again.

Sincerely,

Rose Marie Zurkan
Rose Marie Zurkan

19 September 1995

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

DE WRP: MARY TO:

D18 (INDR)

January 22, 1996

Ms. Rose Marie Zurkan

Dear Ms. Zurkan:

Thank you for your letter. I appreciate your giving us a second chance. We know that we continually need to improve, and I hope that you will find marked differences on your future visits to Independence National Historical Park.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

COMMENTS

THE UNITY MONUMENT

A Proposal for Independence Mall

November 20, 1995

Bo Bartlett

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY REFER TO:

D18 (INDE)

January 22, 1996

Mr. Bo Bartlett

1900r

Dear Mr. Bartlett:

Thank you for your letter and painting describing your proposal for the Unity Monument. I appreciate the time and thought you have put into developing this new symbol of unity.

From time to time, we receive meritorious proposals for new monuments to be erected within the park. Traditionally, however, we consider the historic resources, such as Independence Hall, the Liberty Bell, and many others, to be the monuments this park was created to preserve, protect and interpret. We feel - and our visitors seem to agree - that Independence Hall and the Liberty Bell are the most important resources, and that they must remain paramount. While we appreciate artistic interpretations of the values and themes represented by the park, we generally decline to add new monuments, unless directed by the United States Congress to do so. This will be the case with a Constitution Memorial, for example, mandated by Congress under Public Law 100-433.

It is unlikely that the National Park Service could advocate construction of the Unity Monument in the park. While there are several reasons, the most important is that it would overshadow Independence Hall both physically and symbolically. We cannot advocate any construction within the park that would draw attention away from them. You note that other cities are symbolized by large structures. Philadelphia, of course, already has a symbol: the Liberty Bell.

Additionally, a primary goal for Independence Mall, that has been voiced by the public, is that the mall become more humanly scaled and that uses to serve visitors be added. An immense structure such as the Unity Monument would not meet that goal.

You might be interested to learn that we are seeking a design element for the north end of the mall that would represent a gateway to the park and the historic district. That element would have to be immediately understandable by people in automobiles and buses who are travelling south on Sixth Street from Interstate 676.

COMMENTS

THE UNITY MONUMENT

Every world class city has a defining monument. New York has the Statue of Liberty. Washington has the Washington Monument. Rome has the Coliseum. Paris has the Eiffel Tower. In Philadelphia we don't have a single building, monument or statue which symbolizes our heritage on a grand scale. Unlike The Golden Gate Bridge or The St. Louis Arch, The Liberty Bell is a real piece of history. It is a symbol and people come from all over the world to see it, but then, they go home. Tourists need something on a grand scale to identify with a city. What Philadelphia needs is a monument.

Philadelphia suffers from an inferiority complex. Over a hundred years ago the political capitol of the country moved South to Washington D.C. and around the same time the artistic center moved North to New York. Ever since, Philadelphia has suffered from an "Identity Crisis". Historically, Philadelphia is one of the most important cities in the world because it is the birthplace of the concepts of modern democracy which continue to be a deciding force in an everchanging world. Our cultural heritage runs deep from being the home of the nation's first Art institution to an ever widening ethnic population exemplifying the very meaning of the term "Melting Pot" which constantly breathes new life back into the society. It is time for Philadelphia to restate it's claim on the characteristics which it embodies, the characteristics which embody America: Independence, Freedom, Liberty, The Creative Spirit, Unity.

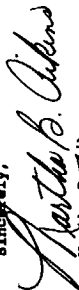
Independence Mall is the perfect place for a monument to celebrate our heritage and our hopes for the future. A monument which will celebrate Philadelphia's unique place in America and the World. A non-nationalistic monument to celebrate all of Humanities hopes and dreams united by democracy in a vision of freedom. A monument which will be a symbol for all peoples of all races and all religions. Not a skeletal reminder of a past we no longer have, or a memorial to people who have died, but a monument embracing our past and a living monument to our ideals. The UNITY MONUMENT will be the symbol for One World. It's design is open. A disc shaped like a dish. A vessel for gathering. A symbol of the feminine, our Earth. Shaped like a huge satellite dish, calling out for togetherness, for peace on the planet for human unity. In the future, as generations of people come from all over the world to visit Philadelphia, wouldn't it be wonderful if, in seeing The UNITY MONUMENT grace our skyline, they would have a renewed sense of Hope, a sense of Oneness with all humanity, a sense of Unity.

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In other words, it would need to be appropriately scaled to be "read" at the pedestrian and automobile level. Your attractive rendering of the Unity Monument, by contrast, demonstrates that it needs to be viewed across an open expanse of plaza and from a great distance. Neither of those conditions are likely to be present in the future.

Sincerely,



Martha B. Atkins
Superintendent
Independence National Historical
Park

RESPONSES

COMMENTS

Bo Bartlett is an artist and a filmmaker who lives in Bala Cynwyd, Pa. He is a 1981 graduate from the Pennsylvania Academy of Fine Art and a 1993-94 recipient of the Pew Fellowship in the Arts.

Bo Bartlett



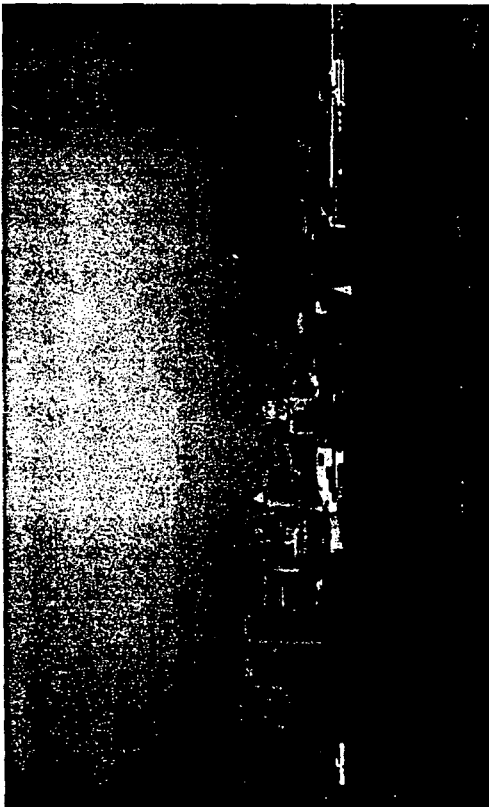
RESPONSES

COMMENTS



RESPONSES

COMMENTS



COMMENTS

Oct 29, 1995

Dear Martha Aikens

I read your article in the Enquirer about coverage given to Independence Park trying to get ideas for further use. I have written before, but never know a new idea that will reach people to far and (Pres.) of course. It includes moving Liberty Bell and Tower to Race St and Lakeside info by 40' Lucite Pagan imagery in bronze the relocation of Independence and the Constitution. On top a large Eagle. The Liberty Bell would be in center of "Pagan" on each drop for open air pavilion and celebration. The sides would be pavilion with lower trees and wide flower. This will free the two center blocks for knowledge and pavilion area for visitors.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

CIVIL RIGHTS

D18 (INDE)

January 22, 1996

Ms. Dorothea M. Bator

Dear Ms. Bator:

Thank you for your recent letter containing ideas for the display of the Liberty Bell. I have shared it with the planning team. We hope to begin detailed design of Independence Mall next year, and yours will be one of the many ideas considered and discussed at that time. I appreciate the time and thought you have devoted to the General Management Plan at Independence National Historical Park.

Sincerely,

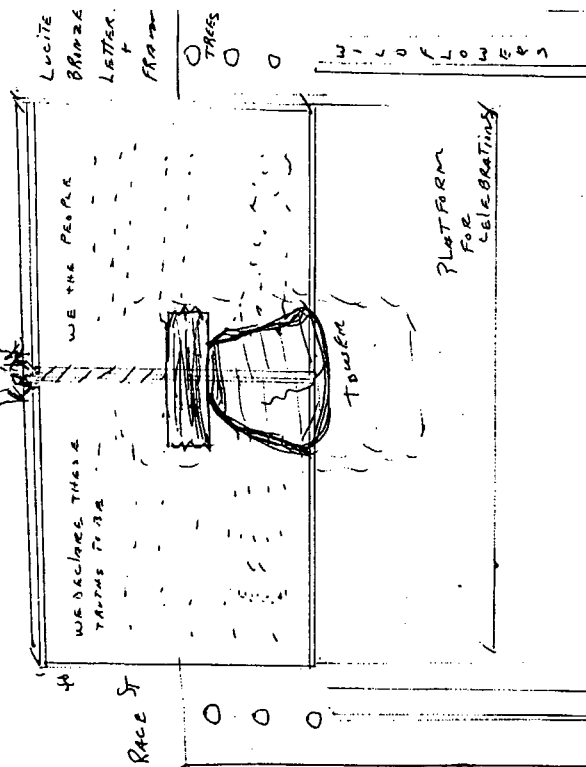
Martha A. Aikens
Martha A. Aikens
Superintendent

RESPONSES

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② I have written before with idea for from "Civilians & Landowners" how in corporate right of huge illustrations of documentation and symbol of liberty. "Look through to the future."

your Truly
Robert M. Bates



COMMENTS

November 19, 1995

To: Martha B. Aikens, Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, Pennsylvania 19106

The following thoughts are my personal response as relate to the November 20th deadline for public input into this phase of the management planning process for Independence Mall.

I've organized my perspective within the framework of "First Block", "Second Block", and "Third Block", in sequence going north from Independence Hall.

One of the fascinations with this particular urban design scenario is the wide variety of possibilities. For me, however, the end product will be the result of a process that either seeks to simply improve the existing situation, or an endeavor which strives for some manifestation of maximum potential.

My feeling is it would be a disservice to the original movers and shakers who exercised their collective vision in and around Independence Hall if we did not reach for the high note. A grand product will elicit the response we all hope for.

An eternal message of our Constitution is that we are deeded the right to pursue our goals. Since we have already reached for the stars, literally, as a direct product of our American heritage, it would be ignoble and even disrespectful to not carefully consider every aspect of this design process. Being truly constructive is to not only build on your assets, but to turn liabilities (or unrealized potential) into strong components of the resultant and more mature whole.

With these thoughts in mind, and with a twenty-plus year direct interest in this specific forum, I offer the following thoughts for consideration, based upon the option that we are seeking an end product that would unite the enormously relevant elements we hold in stewardship here.

Since this is a project that is not only for all Americans, but also in gesture to the heart of all that is American, this is an exciting and inspiring forum, and the end result should clearly express those qualities.

I have a great sense of gratitude towards the National Park Service for providing this great opportunity. For years, it had been my feeling that some future generation would set things right on the Mall, and I feel very fortunate to be able to share in this most special experience.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY REFER TO:

D18 (INDE)

January 22, 1996

Mr. R. Mitchell Deighan

Dear Mr. Deighan:

Thank you for your letters of September 28 and November 19 and for your participation at our public meeting in October. I appreciate the time you have contributed to the General Management Plan (GMP) process, as represented by your thoughtful letters and many fine ideas. Because the second letter incorporates much of the feeling and content of the first, please allow me to respond only to the second.

The preferred alternative of the GMP proposes retaining the Liberty Bell on the first block of Independence Mall, in a new or redesigned pavilion. A primary goal of positioning the Liberty Bell Pavilion is to retain the strongest possible visual sense of connection to Independence Hall. Studies done prior to the Liberty Bell's relocation in 1975 were conclusive both then and now that a location on axis with Independence Hall provides the best visual and symbolic relationship between the two icons.

Throughout the last two years of the GMP process, options for relocating the Liberty Bell to the second or third blocks of Independence Mall were presented to the public. In response, we overwhelmingly heard from the public a desire to keep the Liberty Bell as close to Independence Hall as possible.

You have noted the Great Flag proposal put forth by Harry Belinger and Tony Trezza. I have discussed with them that it is unlikely that the National Park Service could advocate its construction in the park. While there are several reasons, the most important is that the Great Flag would overshadow Independence Hall both physically and symbolically. We feel - and our visitors seem to agree - that Independence Hall and the Liberty Bell are the most important resources, and that they must remain paramount. We cannot advocate any construction within the park that would draw attention away from them.

Additionally, a primary goal for the mall that has been voiced over and over again by the public is that the mall become more humanly

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First Block:


Especially when viewed in comparison to the first block prior to 1976, the first block of 1995 cries to be restored to its open status. The process which produced the current Liberty Bell Pavilion was one that was hurried, in anticipation of the Bicentennial. Years ago, one of Philadelphia's most internationally acclaimed architectural firms explained to me that it doesn't matter what the design of the current Liberty Bell Pavilion is, the Bell was positioned at the wrong spot on the Mall to begin with. The equal and opposite response to the stigma which the current Bell Pavilion has placed on our heritage for the past two decades would be a response that would grant the Bell, the Hall, and the Mall a genuinely open-minded and supportive second look.

Having discussed, written about and reflected upon the Bell situation for two decades and within a wide variety of forums, I now understand there to be an overwhelming number of factors in favor of moving the Bell north of Market Street. I dare to say we will surely fail to hit the high note if the Bell is retained on the first block, all other variables aside.

Fine tuning of the areas that parallel 5th & 6th Streets on the first block is certainly in order. If creating a special nighttime personality for the Mall becomes part of the mission at hand, then it may be revealed that new, classic light columns could be ordered to echo the carpet of green of the first block, and to enhance the sense of progression to the northernmost blocks of the Mall. To the degree that our mission is to enhance the classic nature of the Mall, these light columns - and all elements of the evolved design of the Mall - should reflect a higher understanding of proportions, very much in the model of the design evolution that has bestowed the magnificently proportioned Independence Hall into our stewardship.

scaled and uses which serve the visitors be added. An immense monument such as the Great Flag would not meet that goal.

A number of your ideas are appropriate to a closer examination of the Mall, which will be the subject of a design process that we hope to initiate in this year. When the design team is formed, I will pass your letters on to them.

Sincerely,

 Martha A. Wilkins
 Superintendent

COMMENTS

RESPONSES

Second Block:

I have always been one who has valued the power of the space - the Great Ceremonial Space - that exists between the northern reach of the Judge Lewis Quadrangle arches southwards to Independence Hall. This is a magnificent, breathtaking space (more so, especially, without any permanent obstruction, ie: the existing Liberty Bell Pavilion). However, substantial improvements for this area are in order.

The Judge Lewis Fountain, subject to debate over the years, brought the element of water into a design equation that literally demands that water complement the symbolic and functional requirements of the Mall space. However, the current fountain should be upgraded/replaced, in a manner for it to become a finer part of the totality of the Mall. I just saw a drawing that suggests, for instance, a triangle of green (grass), more-less pointing towards and incorporating the spot of the current fountain, with the triangle pointing northwards. I liked that vision, in that it related to the grassy green carpet of the first block, and it most definitely injected a warmth into the area just north of Market Street.

Also, the northwest corner of 5th & Market and the northeast corner of 6th & Market are weak points on the Mall. These are critical gateways to the Mall north of Market Street, and they are virtually useless at present. Whatever uses and elements would be woven into the fabric of the Mall at these spots should enhance the flow of use northwards, and yet bring new dimensions to the surrounding elements.

Proceeding northwards, Ed Bacon's colorful ideas for the magnificent brick arches are creative explorations of these beautiful yet unresolved cloisters.

Which brings to mind the placement of the Liberty Bell. If our mission is to bring the entire three-block-long Mall to the most dynamic use, then I would suggest positioning the Liberty Bell no farther south than the area just north of the Judge Lewis Quadrangle arches. There is another "dead zone" just immediately north of the arches that is a very special point within the Mall's realm, and from that point northwards to Race Street is the real area of focus.

On the second block, as on all three blocks, there is a real need for an urban design firm like the one which resolved the magnificent space between the Commerce Square towers west of City Hall. Pedestrian patterns, surfaces, and city-scape elements have the capacity to be innovatively upgraded, with the promise of both functional and aesthetic enhancement of the Mall parts.

I know there is a debate on the space beneath the surface of the second block, ie: whether or not to retain the current parking garage in lieu of a National Constitution Center. With great respect to the concerns of all, including our Mayor and the world-class

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COMMENTS

associates within the National Constitution Center office, it is my carefully considered thought that - especially if our mission is to reveal the Mall's greatest potential, both symbolically and functionally - I would give strong consideration to the fact that the underground parking garage is not only superbly sited as a garage, but also very well used. Every time I have been able to access a space in the parking garage, I've had to go down to the third level. Yes, the elevators and other details deserve upgrading, including ventilation.

Thinking about the process that would create a National Constitution Center, I would tend to avoid an option that might end up suggesting anything either hidden or not in direct harmony with the environment that we humans are a product of. Although the idea to utilize the parking garage space is creative and inventive, I also hear that voice that says "if it isn't broke, don't fix it". I make these comments in the hope that the National Constitution Center will achieve its highest possible potential, and definitely not end up with a home that would evoke in some citizens the kind of negative responses that the current Liberty Bell Pavilion has so logically inspired. While I do not harbor any illusions about being able to please all the people all the time, perhaps you can please almost all the people every now and then. The Constitution is there for all of us, and potentially negative images would fail to accurately interpret the Constitution's glory.

RESPONSES

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Third Block:

Here, of course, is the most dysfunctional and weak area of the Mall. Therefore, it should produce the forum to bring balance, evolution, and solution to this process.

Now, after writing a statement like that, I'm reminded that this entire project is a unique and ultimately-special design puzzle, which we are intent upon solving. Since there is no other place with the heritage of Independence Mall, and there is no other genuine Liberty Bell than our Bell, and there is no other United States Constitution other than the one we are empowered by and seek to honor and interpret on the Mall, then we must understand that this project is woven with energies that have transformed civilization.

This project so greatly exceeds the parameters of ordinary "economic development" that to describe these efforts within that realm is to undervalue the greater real potential before us. Nevertheless, excellence is an attractive force, and I would submit none other than our Constitution as the incontrovertible evidence of that fact.

In keeping with these thoughts, I view the third block of Independence Mall as the Land of Opportunity within the mysteries of this process.

If one of the primary goals of this project is to get people into using the third block and thus bring maturity to the Mall, then I would suggest combining the "free agent" variables within this design puzzle there (on the third block), thereby juxtaposing the Bell, the National Constitution Center, a visitors center and accessory museum, National Park Service, and public-use activities in a pattern that would provide the most dynamic interaction between these various functions.

Additionally, the bold vision proposed by Harry Belinger should be carefully considered. His proposal for giant red stripes on the northernmost reaches of the Mall could provide an element that would not only further enhance/reveal the lyrical qualities of the Mall (and American spirit), but also provide a new relationship of the Mall and Park to the Ben Franklin Bridge. The Bridge is a true front door to Philadelphia, but the point of connection between the Bridge and Philadelphia is weak. The giant red stripes would strongly anchor the Mall to the Bridge, thus strengthening the entire area.

The National Constitution Center is already thought to be a potentially essential American place, and of course the Home of the Liberty Bell is a natural primary forum of our heritage. Harry Belinger's giant red stripes, though, as they would combine with the blue and white and stars of the sky and heavens, could become a totally new American gesture that would have Destination quality. In part because of the unifying potential of the giant

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red stripes, I have held Mr. Belinger's proposal in high priority within the realm of possible final-Mall-visions.

Recently, a great friend of Philadelphia produced a thought which we both wrote down, immediately, and these words tell a powerful story: "This Bell may be small, but in the eyes of the world it is bigger and more important than the Washington Monument, and so it can stand on its own place and hold its own ground, just as the Washington Monument."

The Bell was once inside Independence Hall, and if we stand back and think about the act of moving the Bell out of the Hall onto the Mall, it would not be illogical, either symbolically or functionally, to view a site for the Bell at the north end of the Mall as a way to express the fact that the essence of Independence Hall (the Bell!) has been planted all over our Nation's field of dreams. Occasionally we hear voices who question the meaning or reasoning behind the three blocks of the Mall, and that's why I've listed my own reasoning for various parts of the Mall on these pages.

* * *

COMMENTS

RESPONSES

In response to my observations over the past two decades, I must also state my concern for this design process within the context of the greater realm of public projects for Philadelphia over the years of my adult life. On occasion, the product falls short of expectations. Perhaps this is an understatement.

And yet the core of Philadelphia's magnificence remains, sometimes tarnished, but nevertheless of eternal substance. This forum is one that touches the core of this city's preeminent strengths, and so our preparation must be most carefully considered.

Independence Mall is hardly the forum for half-baked projects of any scale. The end product of this process should reflect a maturity of thought. It should be apparent even before anything is built that the entire Mall will become functional and well-reasoned. In order for that to truly happen, the north end of the Mall must become a forceful area that can - in tandem with the strength of Independence Hall - hold the three-block-long Mall in dynamic tension.

If this is not a process which mandates the best possible end-product, we will certainly not attain the potential benefits within this unique opportunity. There is no valid argument for lack of funds. There are plenty of people who have articulated the fact that we can reach for the high note in this forum, and fully expect to sustain that note, since we have a vast American public to embrace to that end. But is the will to choose the higher option there?

If anyone, in any office, might wonder what is the right thing to do, I would ask that person to refer to the resolve of those who produced our Constitution. And yet, those blessed souls found that there can be great strength in compromise. They were, like us, blessed with the time they needed to pull their dreams into reality. We are the stewards of the Founding Americans' hopes and dreams, and we must not let them down at this juncture, since this forum re-visits the essence of their legacy.

Any and all efforts to lift this country and city up to the fullest extent are well within the demands of our collective efforts here. I would prefer we choose options that will combine to reveal that we can be substantially greater than the sum of our parts, for the benefit of all. We have been blessed with the good fortune to debate and resolve this greatest of design forums, and there should be no obstacle to our restating the brilliance of our American providence, especially as we venture upon the threshold of a new millennium.

R. Mitchell Delghan

R. Mitchell Delghan,

cc: Mayor Ed Rendell, & Concerned Parties

7.

COMMENTS

RESPONSES

September 28, 1995

Martha Aikens, Superintendent
Independence National Historical Park
313 Walnut Street
Philadelphia, Pennsylvania 19106

Dear Ms. Aikens:

All other issues, and decisions aside, the Liberty Bell should not be positioned south of Market Street on Independence Mall.

The breadth of vision which gave us the right to speak our minds, and create, and challenge the forces that would seek to limit or ignore us... that precious vision should be reflected in the ordering of the key elements of Independence Mall. While we can learn from actions that lessen the integrity of our heritage, the mission at hand is not to re-visit failed efforts. The light we must follow is that which guided the efforts of the Constitutional Congress. In fact, we are in service to none other but that light of guidance in this forum.

The view northward from the steps of Independence Hall should provide a feeling of empowerment, empowerment of the individual. At one time, there was that feeling. Conversely, the view on a centerline from the Judge Lewis Quadrangle looking southwards towards Independence Hall should be equally free of permanent obstructions. Independence Hall and its defining features should convey the fact that we are greater than the sum of our parts, and that we hold in the highest regard the deeds and documents that have empowered us to strive for our individual and collective potentials. Yes, the Liberty Bell is one of our greatest icons of freedom and liberty, but we must not sacrifice the larger message on behalf of the symbol. All of the potentials and messages of Independence National Historical Park are lessened by siting the Bell on the Mall block closest to Independence Hall.

Now is the time to convey not only our sincerest reverence for our guiding principles, but also our desire to reach for an even greater future. We have that right, and we have that potential, and we need to make the home of our freedoms - Independence National Historical Park - all that it can, and should, be.

Sincerely,



R. Mitchell Deighan

cc: Mayor Ed Rendell
Robert Brasler

written 9/10

COMMENTS

ALVIN HOLM A.I.A.

ARCHITECTS

Memo to Whom it May Concern
Thoughts on Independence Mall
(to accompany a proposal
prepared May 2, 1995)

Independence Mall should be extended - not reduced. It should be taken through to a splendid conclusion, instead of retreating timidly because it has not yet fulfilled its great potential. I agree with most of the current criticism of the Mall but I would propose to go forward for the 21st Century not sullenly backwards.

A great obelisk on the plaza that now holds the Kite and Key would anchor the Mall on the North and provide a dramatic greeting to motorists coming over the Ben Franklin Bridge from Camden. A monumental fountain in the square immediately to the South would attract attention to the Mall itself and begin the sequence of spaces and events that culminate at the opposite end with Independence Hall. Just beyond the fountain two pyramidal buildings would house the proposed Constitutional Center, their forms suggesting the enduring values embodied in the great document while their placement defers to the architectural axis of the Mall. In the next block South the Judge Lewis Quadrangle could be beautifully completed by a circular colonnaded pavilion to house the Liberty Bell. The domed temple forum would occupy the position of the long-unused fountain, complementing and enlivening the rectangular arcades that have stood forlorn for so long. They functioned well for the Bicentennial; they can live again as a Forum of Liberty, now focused on the Bell.

Between the New Bell Pavilion and Independence Hall two square bosques of trees would be placed South of Market Street to reduce the width of the central promenade and to reduce the depth of the plaza on Chestnut Street. This would bring the plaza into a more comfortable scale with the Hall, in answer to one of the most frequently noted problems of the present scheme. Finally I would propose a pair of fountains to grace each side of the plaza, providing refreshment and visual liveliness for a space that has been barren for many years. Then it could embrace the Hall and complement it instead of dwarfing it as it does not.

Reversing the sequence of this scheme, a visitor in front of Independence Hall would look across the street to a pleasant park and see, between the fountains and through the bosque of

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-315 Walnut Street
Philadelphia, PA 19106

IN REPLY REFER TO:

January 22, 1996

D18 (IMDE)

Mr. Alvin Holm, AIA

Dear Mr. Holm:

Thank you for your paper and drawings of your proposal for Independence Mall. Some aspects of your design scheme could be realized under the National Park Service's preferred alternative for the General Management Plan for Independence National Historical Park.

As you say know, we hope to begin detailed design for the mall this year. When the design team has been formulated, I will pass your proposal on to them for consideration.

Sincerely,

Martha B. Aikens
Superintendent

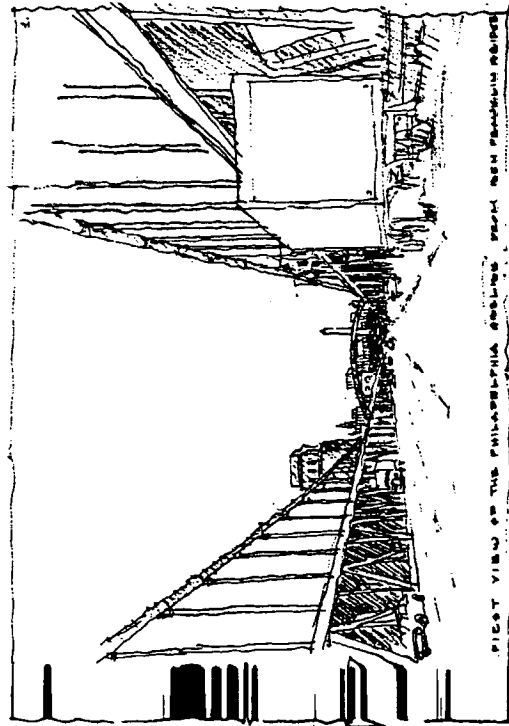
RESPONSES

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trees, the domed pavilion of the Liberty Bell and far beyond at the end of the Mall the mighty Philadelphia Obelisk that asserts our city's pride and strength as it enters the next millennium.

To complete the entire ensemble Franklin Square should be brought into the picture relating diagonally to the redesigned square where I am proposing a monumental fountain dedicated to Jefferson, and directly East to the Plaza of the Obelisk. Franklin Square should relate as easily and gracefully to Independence Mall as Washington Square now relates to Independence Square. Perhaps the lurching sculpture of the Kite and Key would look better among the trees of Franklin Square than looming crazily as it does now in front of motorists coming off the Bridge.

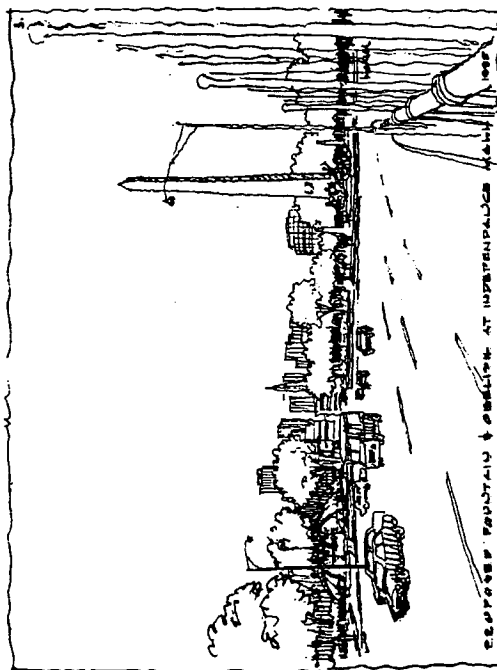
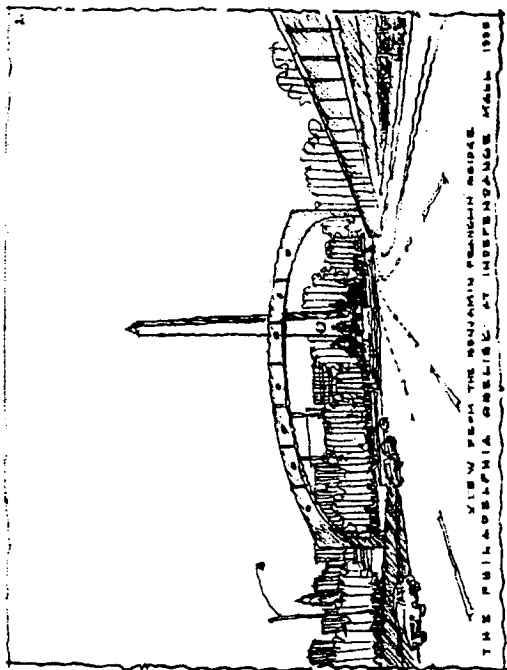
Some would say - and some have already said - that to propose architectural forms such as these is premature before appropriate planning and design parameters have been established, integrating the various commercial and institutional factors, the overlapping governmental jurisdictions, the sociological, educational, political considerations, etc. Maybe so. But I think the images are primary. Here is a scheme that could fly.



PICOT VIEW OF THE PHILADELPHIA SQUARE FROM NEW FRANKLIN BRIDGE

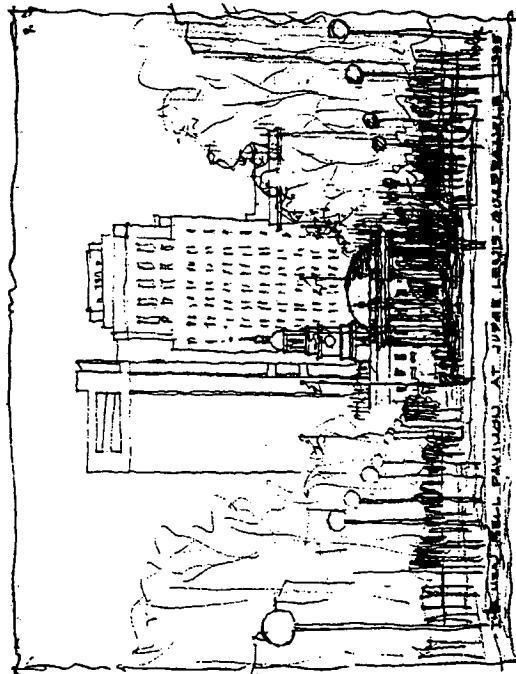
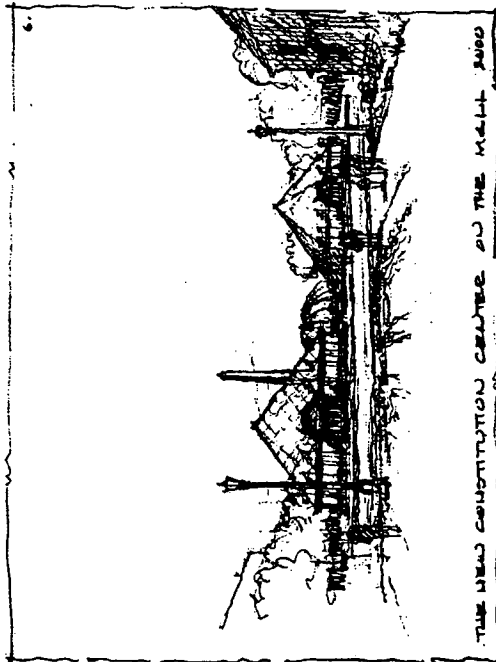
RESPONSES

COMMENTS



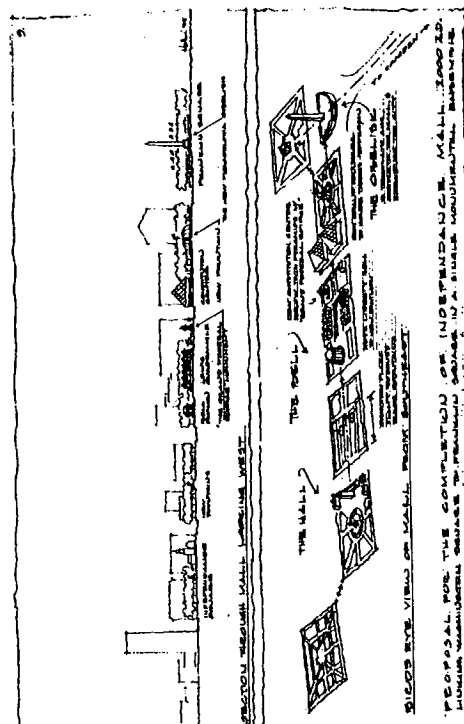
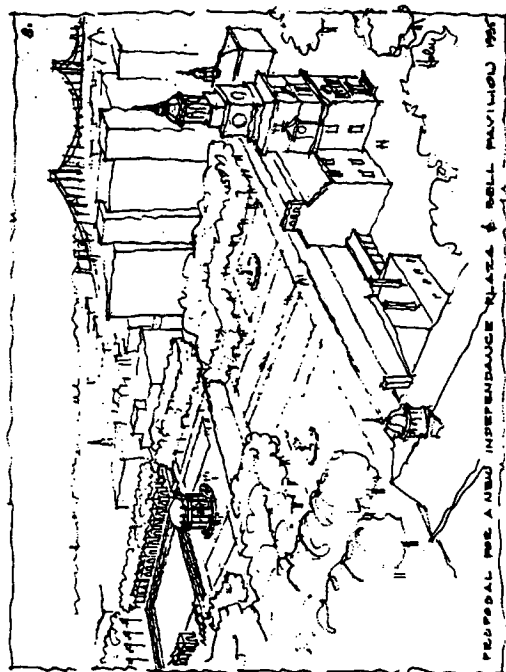
RESPONSES

COMMENTS



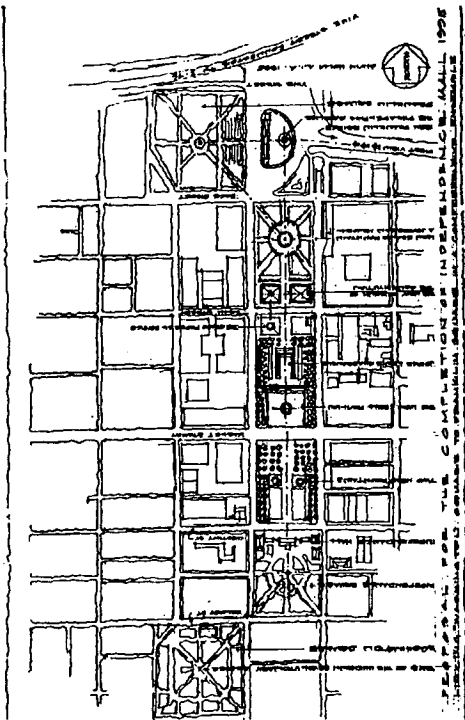
RESPONSES

COMMENTS



RESPONSES

COMMENTS



COMMENTS

NOVEMBER 16, 1995

MICHAEL LEHMAN
DANIEL DALY
RAMFIS MORALES
[REDACTED]SUPERINTENDENT MARTHA AIKENS
INDEPENDENCE NATIONAL HISTORICAL PARK
313 WALNUT STREET
PHILADELPHIA, PA. 19106

DEAR SUPERINTENDENT AIKENS,

ENCLOSED IS A PROPOSAL THAT WE HAVE DRAWN UP FOR THE INDEPENDENCE NATIONAL HISTORICAL PARK.

AS CITIZENS WE URGE YOU TO CONSIDER THE PROPOSAL WITH AN OPEN MIND.

WE FEEL THAT PHILADELPHIA AND ITS SURROUNDING REGION HAVE MUCH TO OFFER THE TOURISTS OF THE WORLD.

WE WANT VISITORS TO AMERICA'S MOST HISTORIC CITY, NOT ONLY TO STAY LONGER IN OUR REGION, BUT TO LEAVE AND SAY WOW WHAT A GREAT EXPERIENCE!!

WE BELIEVE THAT THE VISITORS EXPERIENCE STARTS AT INDEPENDENCE NATIONAL HISTORICAL PARK.

WITH THAT IN MIND LET US BEGIN OUR JOURNEY IN TIME TO "AMERICA'S MOST HISTORIC SQ. MILE."

THE VISITOR STARTS HIS/HER JOURNEY BY ENTERING THE CAR/BUS RAMPS TO THE UNDERGROUND PARKING GARAGES VIA 5TH OR 6TH ST. AND RACE.

ONCE PARKED THE VISITOR IS GREETED BY OUR COLONIAL DRESSED GREETERS WHO ESCORT PEOPLE TO THE VISITORS CENTER. THE CENTER WOULD HAVE TOUR INFORMATION ON ALL ACTIVITIES FOR THE PARK AND THE REGION.

NOW HAVING CHOSEN THE TOUR YOU WOULD PREFER THE VISITOR MOVES TO THE THEATER OF AMERICA PRESENTATION OF AMERICA THE BEAUTIFUL

EACH STATE WILL BE GIVEN TIME TO BE FILMED AT ITS BEST FOR ALL THE WORLD TO SEE, WITH THE MOVIE ENDING WITH SHOTS OF PHILADELPHIA TODAY.

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

BY AIR MAIL FIRST CLASS

D18 (INDE)

January 22, 1996

Michael Lehman
Daniel Daly
Ramfis Morales
[REDACTED]

Dear Sirs:

Thank you for your letter with its proposal for a different experience for visitors to Independence National Historical Park. Although the proposal is highly imaginative, elements including historical recreations, glass domes, a festival marketplace, and animatronics make it infeasible in terms of capital and operating costs, law, and National Park Service policy.

Your interest in enhancing tourism in the city is commendable. I suggest that you contact the developers of Penn's Landing or other sizeable empty spaces.

Sincerely,

Martha B. Aikens
Superintendent

RESPONSES

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AS THE MOVIE ENDS, THE DOORS OPEN TO OUR CARRIAGE RIDE, THAT WEAVES THE VISITOR THROUGH A RECREATION OF PHILADELPHIA DURING THE PERIOD THE CONSTITUTION WAS WRITTEN. WE COME UPON ALL THE CHARACTERS THAT PLAYED A ROLL IN MAKING THE DOCUMENT WHAT WE LIVE BY TODAY.

THOSE CHARACTERS WILL COME ALIVE, IN THE FORM OF AUDIO ANIMATRONICS, WITH THE GOAL OF BRINGING THE CONSTITUTION TO LIFE.

OUR CARRIAGE WILL NOW BEGIN ITS JOURNEY UP INTO THE NEWLY REDONE LIBERTY BELL PAVILION (NORTH SIDE OF MARKET ST.) THE RIDE ENDS AT THE TOP POINT IN THE PAVILION.

THE PAVILION WOULD BE HOUSED IN DIAMOND CUT GLASS, WITH THE LIBERTY BELL HUNG FROM THE CEILING THROUGH THE CENTER OF THE PAVILION. THE VISITOR ALSO SEES INDEPENDENCE HALL.

THE VISITOR STEPS ONTO THE TOP OF THE CIRCULAR RAMP, THAT GOES AROUND THE BELL.

THE VISITOR THEN BEGINS THE WALK AROUND THE BELL. THE PAVILION WILL BE FITTED WITH FIBER OPTIC AND LASER LIGHTS, AND AN AUDIO TOUR OF THE BELL WILL PLAY THROUGH SPEAKERS IN THE RAMPS.

AS THE VISITOR LEAVES THE PAVILION YOU WILL ENTER A GLASS DOMED AREA BORDERED BY RACE AND MARKET ST.

THE AREA WILL HAVE 13 GLASS POINTS TO REPRESENT THE 13 ORIGINAL STATES. THE DOME WILL HAVE FIBER OPTIC AND LASER LIGHTS SO THAT EACH EVENING THERE WILL BE LIGHT AND FIREWORKS SHOWS UNDER THE DOME.

THE DOME WILL HOUSE FREEDOM WAY A FESTIVAL MARKETPLACE THAT WILL HOUSE ALL THE BEST FOOD GOODS AND SERVICES FROM ALL THE STATES, THE VIRGIN ISLANDS AND PUERTO RICO. THERE WILL BE FLAGS, KIOSKS, TOUCH SCREENS FOR INFORMATION ON THE STATES, AND IT WILL BE ABOVE AND BELOW GROUND. ON THE 6TH ST. SIDE ABOVE THE CARRIAGE RIDE WILL BE A BOTANICAL GARDEN AND SITTING / EATING AREAS UNDER THE DOME.

THE VISITOR IS NOW URGED TO TAKE THE WALK TO CONSTITUTION WAY WHICH WILL BE THE AREA FROM MARKET ST. SOUTH TO INDEPENDENCE HALL. THE CONSTITUTION CENTER WOULD BE LOCATED IN THIS AREA. CHESTNUT ST. WOULD BE CLOSED TO TRAFFIC BETWEEN 5TH AND 6TH ST. OPEN TO WALKING TOURS AND CARRIAGES. THE STREET WOULD BE RE COBBLESTONED FOR PARADES AND AN AREA WOULD BE THERE TO EXPRESS OUR RIGHTS AS AMERICANS.

WE ARE NOW READY TO TOUR INDEPENDENCE HALL. THE VISITOR HAS BEEN INFORMED THROUGH THE RIDE AND CAN APPRECIATE WHAT THESE MEN HAD THE VISION TO CREATE, THROUGH THIS DOCUMENT, AND HOW DEMOCRACY WORKS IN THIS THE GREATEST COUNTRY IN THE WORLD.

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THIS EXPERIENCE WAS ALSO ENVISIONED AS A WAY TO HELP THE VISITOR TO WANT TO STAY IN PHILADELPHIA LONGER THAN A FEW HOURS, AND TO HAVE TOURIST DOLLARS SPILL OUT INTO OUR HOTELS, RESTAURANTS AND ENTERTAINMENT VENUES SO THAT THE VISITOR LEAVES THE AREA WITH THE DESIRE TO RETURN AGAIN, AND AGAIN, AND, TO GO HOME AND TELL THEIR FRIENDS AND RELATIVES WHAT A GREAT CITY PHILADELPHIA IS AND WHY WE CALL IT "THE CITY OF BROTHERLY LOVE."

WALKING TOURS WILL BE AVAILABLE AS WELL OF OLDE CITY, BETSY ROSS HOUSE AND OTHER HISTORIC SITES IN THE CITY.

THE AREA SOUTH OF CHESTNUT WOULD STILL REMAIN AS GARDENS FOR ALL TO STROLL THROUGH AND ENJOY.

ALSO THE IDEA IS TO KEEP ALL WALKING SITES IN THE AREA BORDERED BY MARKET AND CHESTNUT STREETS.

ALL THROUGH THE AREA WILL BE FOOD KIOSKS AND AREAS FOR THE VISITOR TO REST AND ENJOY THE AMERICA THAT WAS. WE LOOK FORWARD TO BEING A PART OF THIS VISION THAT WE ARE PROPOSING. WE DO SO IN THE SPIRIT OF PEOPLE WHO LOVE PHILADELPHIA!

THANK YOU FOR YOUR CONSIDERATION.

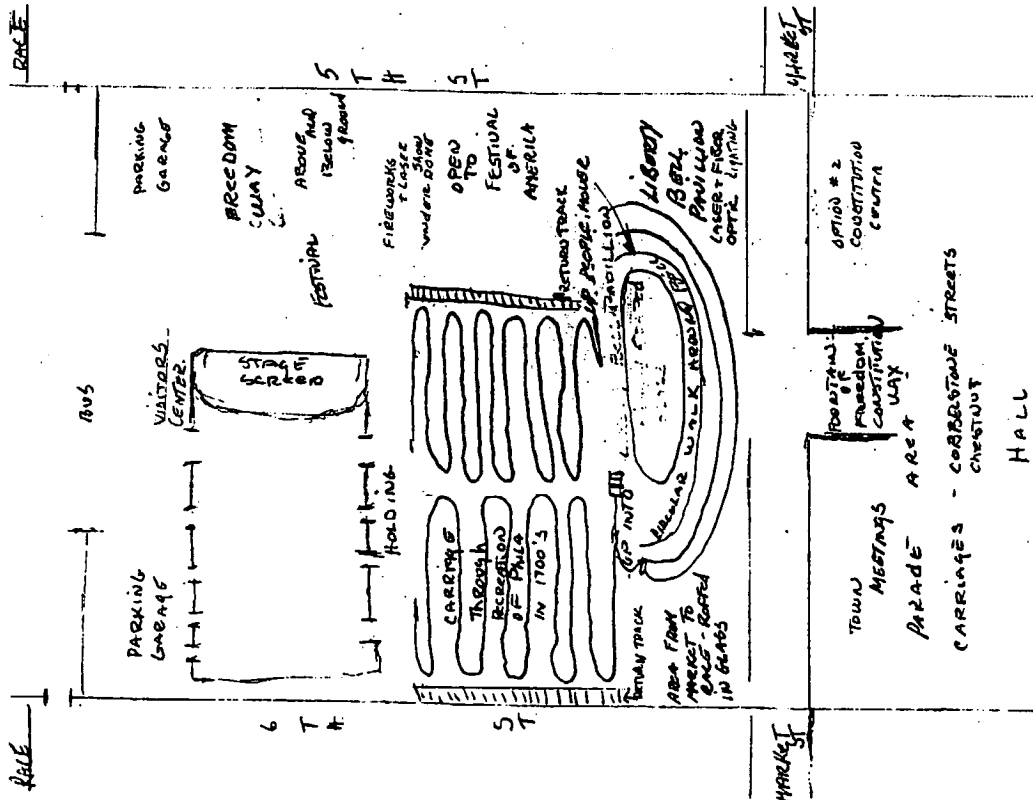
SINCERELY,

Michael G. Lehman

MICHAEL LEHMAN
DAN DALY
RAMFIS MORALES

RESPONSES

COMMENTS



COMMENTS

VisionTation

TRANSPORTATION SYSTEMS CONCEPTUALIZATION FOR THE NEW CENTURY

NATIONAL PARK SERVICE
Independence National Historic Park
313 Walnut Street
Philadelphia, PA 19106

Attention: Martha Aikens, Superintendent

Reference: New General Management Plan Comments

Dear Mr. Aikens:

I'm a native Philadelphian with a life long interest in history and urban design and have a special place in heart for Independence National Historic Park where mankind wrought what, I feel is its greatest achievement. Previously I've received very favorable response from government, planning agencies, officials and knowledgeable individuals to other of my urban planning concepts such that I am even starting a company, "VisionTation" to further develop and properly present these plans. I'm presenting my ideas here in order to gain further experience and recognition, and, out of my respect for what this site represents.

Regarding redesign of Independence N.P. I have just now completed comprehensive and unique plans that resolve the various concerns and conflicting needs of the Mall while also addressing critical issues that have not usually been addressed or sometimes even acknowledged by other regard the entire park. All of published NPS, private plans and philosophical debate about the nature of further development have each had very good points that are often seemingly and until now mutually exclusive. Through intensive study and effort I've been able to come up with a design concept that solves the riddle of both placing several large dynamic structures on Independence Mall (in order to correct that empty feeling of the 2nd and 3rd blocks everyone complains about and provide the city and park with critical tourist-generating features of course) and yet also keep over three quarters of the critical open green spaces of the Mall. This includes preserving most of the existing grove of urban trees above Arch Street with I believe is emerging to be more and more desirable while putting several large buildings there also. It can be done without building all the structures underground which would defeat both aims. Yet, I can still have both the Constitution Center and the Arch Street sided Visitor Center front on the Liberty Bell and Independence Hall visually. In what I hope will be a VisionTation trademark, if my concepts are followed, there is plenty of room for the Independence Institute and even future buildings deemed important enough and that such a dramatic complex would likely attract while maintaining the same amount of aforementioned green spaces. Each new building would have a view of the Hall

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RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

IN REPLY LETTER TO:

D18 (INDB)

January 22, 1996

Scott W. Maits
Visiontation

Dear Mr. Maits:

Thank you for your letter describing your ideas on Independence National Historical Park and adjacent areas. You are clearly inspired by the possibilities and I commend you on the amount of time and thought you have put into your concepts.

The General Management plan is a broad, programmatic document, and the National Park Service has not reached a level of conceptual or detailed design that would be commensurate with your proposals. We hope that a conceptual design process for Independence Mall will be initiated in this year. When the design team is formed, I will forward your letter to them.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

RESPONSES

COMMENTS

 VisionTation

TRANSPORTATION SYSTEMS CONCEPTUALIZATION FOR THE NEW CENTURY

and Bell and, actually, add backdrop drama to the entire Mall. Further, each would by the unique nature of the concept provide even more hard surfaced open space! This aspect of the design would along with transportation resources already in place, provide amphitheater facilities to support the very large, national gatherings that first amendment, political, patriotic and commemorative events this World Heritage Site can inspire. The amphitheater design north of Market Street even largely migrates big crowd impacts on historic sites and adjacent green areas of the park. The "Vision" here is to be able to do all of this for the same costs as projected by the other designs currently preferred by NPS.

Regarding security in relation to site design, I have only seen provisions for VIP security that would be provided for at small gatherings at Chestnut Street behind Independence Mall, a security-conscious relocation of the Liberty Bell and normal policing and crowd control. I think just as important is built in design protection of the other priceless artifacts of the park. Though my plans would probably be controversial (only due to John Q Public's and business interests' insistence that they be able to drive on each and every street, lane, alley and, eventually, more and more previously non-road space) these security provisions, which are my previous career area of expertise, will be tourist and park friendly. I truly believe that they would not adversely affect Philadelphia's commerce while protecting irreplaceable Independence, Congress and Old City Halls among others. While you cannot and should not bomb proof American society, nevertheless, the Independence Mall complex will become the source of future increasing security concerns. As major national/political symbols are becoming better protected, such as the White House and Capitol, UN, armed forces institutions, etc. other nationally known, not currently hot spots but that can generate international attention, especially Philadelphia's unique political/historical icons, become increasingly vulnerable. VisionTation's relatively simple changes could preempt a world-class tragedy some day.

Bike/multi-use paths have not even been mentioned by any other plans for the Park despite the fact that part of its stated mission is recreational and part of the only workable cross-town bike path through the heart of Center City with its thousands of riders. Directly linking Center City to both the waterfront and the Ben Franklin Bridge, the green blocks of the park are a vital connection between New Jersey, the projected Delaware River Path, University City, For Mifflin, Fairmount Park, and the 90+ mile Schuylkill Valley Path which will connect the (Valley Forge) Great Valley/Aigen/Susquehanna (Lancaster Co.) Path and other areas. A whole new generation of bike users in addition to other recreational users and the wheelchair bound need this critical feature that can only be economically facilitated now till the next redesign (which we hope to postpone far

COMMENTS

RESPONSES

VisionTation

TRANSPORTATION SYSTEMS CONCEPTUALIZATION FOR THE NEW CENTURY

many years through "Visionary" planning now). Pennsylvania is the leading state in bike path mileage and Philadelphia has the most bikers in the state, in addition, of course, to the American Bike Championship course. We must build on this legacy as it is fast becoming an important tourist factor, as well as for the benefit of city and regional usage for, despite this actual leadership role, Pennsylvania is not yet known as a biking-friendly state by the general population. The state's top tourist destination as well as the critical Center City route it would provide could go a long, long way to rectify this perception.

Mass transportation, which is VisionTation's specialty is also critical to the site's success. While charterbus/auto access largely from I-95 and I-76 via I-676 has been paramount to park planning, visitor access via mass transit has always been addressed as an after thought. NPS's stated desire to work with the city on Park, Old City and city (bus-trolley) tourist shuttles is the correct first step for all involved. The Center City Improvement District has said they support eventual expanded (real) trolley service for downtown tourists as the mayor has also indicated. Philadelphia which already has the infrastructure in place of the largest streetcar system in the U.S. as well as a newly enlightened and enthusiastic management has a unique opportunity to develop a trolley trademark for its downtown, park and tourist areas much like San Francisco's cable car. Pollution free, comfortable fast if properly designed, trolleys which are considered fun by the public could, if properly supported by all parties eventually take over nearly all city tour bus routes. An attraction in their own if correctly executed these literally would be the vehicles that get tourists along the dynamic orientations at the new Visiting Center, to stay awhile and see the rest of Philadelphia (and spend lots of money). Septa is proposing a Light Rail line from 30th Street Amtrak Station through Center City along Chestnut Street to 5th street and then looping around Old City to Penn's Landing and return among other routes. Antique and/or historic styled street car would also be used. Unfortunately, as currently aligned this doesn't exactly jive strongly with the Arch Street Visitor Center/Gateway. Moreover, I have a better plan (better for Septa for which it was and is originally intended) that does have trolleys arriving and departing Center City at the Arch Street Gateway. This alignment also directly serves the Washington Square, Elfreth's Alley, Arwaster Kent, Balch Institute, Betsy Ross House, the Declaration House, Firemen's Museum, Vietnam Memorial, Arch Street Friends Meeting House, The 2nd Street Parking Garage, South Street, Jeweler's Row, among others which SEPTA's current projection does not cover, in addition to the ones it does. I also have plans for bus loading adjacent to the Arch Street Gateway that mitigates their negative impact on the Park and uses the best existing features of that portion of the Mall to do it with little further construction. Unlike anyone else's plan, I have improvements to the Subway Station which is heavily used by tourists visiting the Park by

RESPONSES

COMMENTS

VisionTation

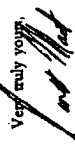
TRANSPORTATION SYSTEMS CONCEPTUALIZATION FOR THE NEW CENTURY

opening up the station to some sunlight and easy, including no-step access. This also solves the pedestrian crossing dilemma that will just increase with greater numbers of visitors by using the same facilities needed for the station improvements with a wide and, if handled properly, attractive underpass unlike anything currently in town requiring no stairs for the main route. These passageways can even pass to both sides of 5th Street connecting the spectator Bourse Building atrium's underused lower level and the existing Mall underground garage site.

There are other important specific plans related to the Park and, of course, the actual details of the concepts I have already outlined here for you. I have a proposal for an early industrial history museum which is fast becoming the hottest new field in museum development. There are other physical ways of tying the Park into Peru's Landing, as well as the Old City and Society Hill. I just hope this letter has piqued your interest enough to allow me to arrange a meeting with you and/or your top planners for a serious consideration of these critically needed features. I'd like to spend a half hour or more in an informal presentation or talk about this "Vision" for Independence N.P. And, I will be working with the mayor's office, Constitution Center people, Septa and appropriate politicians to bring these concepts to fruition. I regret having missed the earlier workshops you had for the public. I only became aware of your excellent on-going public input process after that phase had passed. I did briefly testify at one of the public meetings about my then developing concerns. I got on your mailing lists and received two items, but didn't see the comprehensive Environmental Impact Statement including newly listed alternatives now included in your study at all till last week. Job and personal considerations prevented me from further pursuing the issues until recently. I've just been able in the last few days to crystallize my concepts that I've been considering for years along with the best of other ideas into workable plans. Those plans solve the paradoxical needs of today and has the Vision that anticipates the concerns of tomorrow in relatively cost effective ways. I hope you'll take this step to further improve the design for America's most historic square mile.

Thank you for your time and consideration regarding this matter.

Very truly yours,



Scott W. Maits
VisionTation

SWM:rgw
maits\unp-ltr.doc

COMMENTS

Martha B. Aikens
Superintendent
Independence National
Historical Park
313 Walnut Street
Philadelphia, PA 19106

15 XI 95

Submitting for your consideration, design of a monument that could be erected in Independence Park. It is composed of three steles, one central, large, and two small laterals, which are fluted against the central stele. The three inserted into the bedrock, quarried from below the monument or nearby.

Height 12 ft (stele lot), thickness, 10 inches for the central and 6 inches for the laterals (4 ft. high). Granite would be suitable stone, over marble. Also, it can be sculpted to produce tonal patterns, as for giving visual relief to the notched borders of the Colonial plate sign, as seen in many bronze signs on building in Independence Park. Also, to bring out the Ionic columns, which are incised.

The cascading Declaration, in relief, would show an evolving document, alive today as it was in 1776. The bronze plaque shows effluences of democracy before the Revolution. Is the Magna Charta 1215 incised, at upper left corner. In relief, the Articles of Confederation, 1781, as a scroll, right side of plaque. At bottom, George Washington's Presidential Seal, with "PROFUNDUS IMPERA" added. Atop the Ionic columns, incised, "ATHENS-509BC, the triumph of democracy over tyranny, that opened the portals to Periclean democracy that lasted a century. Lettering and Emblem in bronze. Back of central stele will contain only the Emblem and "EGALITARIAN APPELLATION", incised, as is the egalitarian parallel lines of both laterals and border lines.

Ternathaeon, underscored with "BEDROCK OF DEMOCRACY", evokes the equal import of the three documents. You do not appeal to one of them without reference and balance to the other two.

FUNDING. Replica of the monument made in two-tone pewter (bronze?) paper weights, four inches high; and 6 inches high, as a mantle and trophy shelf piece. Also, as a flat cut out piece to hang. The small sizes to sell for \$10, the larger for \$20, at the Park Gift Shop and similar outlets in the city and metro. Receipts from these sales would furnish funds for a national sales program on TV. Of three million tourists visiting the city annually, half visit the Bell. If one million buy one model at \$10, it would render ten million nationally, ten fold? In an election year response would be high.

Safely, returns could cover half of the estimated Independence Park \$170 million programs. At a later date the Emblem, with the Ternathaeon on the reverse side, could be coined as a medal salutations.

V. Rapone



RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
313 Walnut Street
Philadelphia, PA 19106

REPLY TO:

D18 (INDE)

January 22, 1996

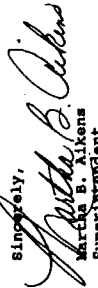
V. Rapone

Dear Mr. Rapone:

Thank you for your letter describing your proposal for Ternathaeon. I appreciate the time and thought you have put into developing this comprehensive interpretation of these most important documents.

From time to time, we receive meritorious proposals for new monuments to be erected within the park. Traditionally, however, we consider the historic resources themselves, such as Independence Hall, the Liberty Bell, and many others to be monuments. While we appreciate artistic interpretations of the values and themes represented by the park, generally decline to add new monuments unless directed by the United States Congress to do so. This will be the case with a Constitution Memorial, for example, mandated by Congress under Public Law 100-433.

Sincerely,



Martha B. Aikens
Superintendent

COMMENTS

RESPONSES

TERNATHEON®
- Rhymewith Pantheon -

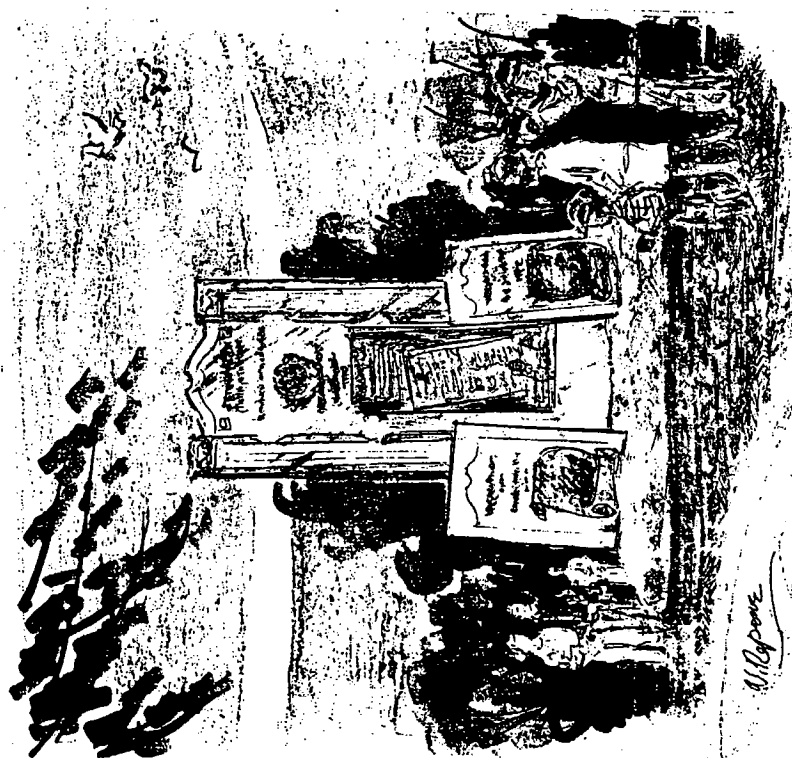


22. SHOULD BE REMOVED UNDER ABOVE MATTER BY INDEPENDENTLY VERIFIED, WISCONSIN, FALL, IN DALLAS COUNTY TEX.

THE CHAIRMAN DECLARATION ON INTELLECTUAL PROPERTY RIGHTS AND THE DUTY OF THE STATE TO PROTECT THE RIGHTS OF THE PEOPLE TO THE CULTURAL HERITAGE OF THE NATION

RESPONSES

COMMENTS



TERNATHEON

HEROIC OF DEMOCRACY

EGALITARIAN
APPELLATION

SUGGESTED FOR INDEPENDENCE PARK

VICTORIA, BRITAIN 1915

COMMENTS



JAMES J. REIS REAL ESTATE INC.

Serving Business and Industry

31 East Butler Avenue ■ Ambler, PA 19002 ■ 215-642-8800

September 20, 1995

Ms. Martha B. Aikens
INDEPENDENCE NATIONAL HISTORICAL PARK
313 Walnut Street
Philadelphia, PA 19106

Dear Ms. Aikens,

I recently received your letter outlining plans for the future of Independence National Historical Park. This would be a great means to attract tourism and at the same time offer history as an inviting enjoyable pursuit.

Stan Runyan, Runyan & Associates Architects, and myself have a concept a little different than those alternatives outlined in your study. Our concept could include a Bell Tower at Race Street which could possibly house the Constitution Center. Along the three block promenade, we envision Housing, similar to Williamsburg, which could represent all 50 states. At Market Street, we would incorporate "190 High Street" into the design. (This is the house owned by Robert Morris that was rented to George Washington and John Adams in the 1790's.) We think this reconstruction could be a great location of the Liberty Bell.

Finally, we should contact the National Board of Realtors and through their affiliate states see if the state Realtor associations would want any part of underwriting the costs.

We all have ideas, we all love history. This idea, if implemented, would significantly impact Philadelphia as a tourist destination stop. The project could tie in nicely to the Gallery and the Convention Center.

Please let us know if this idea has any merit.

Thank you.

Respectfully,

James J. Reis

C.C. - C. Stanley Runyan

Member
SOR
Society of Industrial and Office Realtors
with Affiliates in 350 Cities

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

D18 (INDE)

December 11, 1995

Mr. James J. Reis
James J. Reis Real Estate, Inc.
31 East Butler Avenue
Ambler, Pennsylvania 19002

Dear Mr. Reis:

Thank you for your letter regarding the General Management Plan for Independence National Historic Park and for your appearance at the public meeting. I appreciate your interest in the park and the time you have devoted to thinking about its future.

David Hollenberry, of the National Park Service's Northeast Field Area staff, recently met with Mr. Stan Runyan to discuss your concept for Independence Mall. I believe that Mr. Runyan will formally submit the proposal for review and comment, and at that time, we will prepare a detailed letter of response to you.

Sincerely,

Martha B. Aikens
Martha B. Aikens
Superintendent

COMMENTS

URBAN DESIGN PROPOSAL for INDEPENDENCE MALL
INDEPENDENCE National Historical Park
Philadelphia, Pennsylvania

ABSTRACT of GENERAL CONCEPT

RUNYAN & ASSOCIATES, ARCHITECTS
15 W. Highland Avenue, Philadelphia, PA
215 242-5772

11 October 1995

BACKGROUND

The idea of a monumental space to the north of Independence Hall has a long history. Although current wisdom may support the belief that the original buildings that made up the complex historic cityscape would have been superior to the current ill defined and generally unpleasant urban spaces that exist, the buildings are gone. What remains is, however, a perception or collective consciousness of a place, regardless of quality, that is widely recognized.

Contemporary Independence Mall is, for reasons beyond the scope of this abstract, an urban design failure. The potential of this massive urban space has not been realized and continues to be vigorously debated. With the National Park Service's selection of a preferred plan of facilities and activities for the Mall, the central focus must now be shifted to how to effect a successful urban design approach to this vast and significant area of Philadelphia.

URBAN DESIGN CONCEPT

This concept is based on the Park Service's preferred plan for INDEPENDENCE NATIONAL HISTORICAL PARK that has recently been articulated. The intent of this abstract is to present a general concept for further research, development and presentation that is capable of fulfilling the goals of the Park Service. The most basic attributes of the concept are as follows:

REC'D
JAN 2 3 1996
ARCHITECT

RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Independence National Historical Park
311-313 Walnut Street
Philadelphia, PA 19106

ON REPLY LETTER TO:

D18 (IND2)

January 22, 1996

Mr. C. Stanley Runyan
Runyan & Associates, Architects
15 West Highland Avenue
Philadelphia, Pennsylvania

Dear Mr. Runyan:

Thank you for your letter and illustration describing your proposal for Independence Mall. I appreciate the thought that you have put into it and particularly your comments on urban design goals. A number of the ideas you propose have not been articulated in the public process. When the design team is formed, I will pass your packet on to them for consideration.

I previously received a letter from Mr. James J. Reis, who collaborated with you in developing this proposal. I had committed to responding in detail once your proposal was received. However, one feature noted by Mr. Reis was not noted in your letter, and I will respond to it now, with the assumption that you will share this letter with him.

Mr. Reis' letter proposes the reconstruction of 18th century houses on the wall. It is a policy of the National Park Service to avoid reconstruction except in special circumstances, including the availability of detailed and incontrovertible documentation of a lost building, remarkable significance, and exceptional interpretive value. The proposal for houses would not meet these criteria. In addition, the General Management Plan for the park projects that substantial open space is needed on the wall to accommodate outdoor events. And of course, Old City and Society Hill contain a large number of 18th and early 19th century structures, even more, in fact, than Williamsburg.

Sincerely,

Barbara B. Alkema
Barbara B. Alkema
Superintendent

RESPONSES

COMMENTS

Urban Design Proposal for Independence Mall
11 October 1995
Page 2

1. MALL MAINTAINED BUT REDEFINED

In the construction of new facilities on the Mall, maintain the concept of an Independence Mall as a space recognized in the urban, cultural and historical landscape of Philadelphia by its citizenry as well as visitors to the city. New buildings can be overlaid, preferably above grade, on the Mall while creating a richer definition of urban space more appropriate to Philadelphia's street grid and history.

2. CREATE A NEW CIRCULATION FRAMEWORK

Create a strong and understandable pedestrian circulation system that enhances visual relationships between the Mall and the surrounding city and contributes to the utilization of new facilities. The most workable system may probably be found in the central axis schemes that were originally developed for the Mall but only marginally implemented. The development of a central axis would offer the following opportunities:

2.1 STRONG SENSE OF PLACE: A central axis for pedestrian access would maintain the historical theme of Independence Mall as an organizing factor and would create a strong sense of spatial identity and orientation for the visitor.

2.2 VIEWS: A central axis in the form of a pedestrian street has the potential to respect the views and significance Independence Hall as well as to draw visitors to the northern two blocks of the Mall. Such a "street", richly articulated, would respect the scale of the cityscape of Philadelphia, preserving views of Independence Hall and to new facilities to the north, including a new Visitor's Center and The National Constitution Center. The current Liberty Bell pavilion serves as both a barrier to Independence Hall from the north and to the northern blocks from the south and should be relocated off of a central axis.

2.3 ACCESS TO NEW FACILITIES: Entrances to new facilities would generally be along this new pedestrian walkway, along with a series of public spaces described below.

2.4 SPECIAL EVENTS: The central pedestrian street would serve as a staging area for special events, including the possibility of a three block long parade route.

RESPONSES

COMMENTS

Urban Design Proposal for Independence Mall
11 October 1995
Page 3

3. RESTORE DEFINITION TO CITY STREETS

The richness of several key blocks of Philadelphia's cityscape that was lost in the creation of the Mall could be regained by generally locating the planned facilities on the periphery of the blocks, with building facades built to street lines. Key public open spaces would be created at block corners as described below.

4. CREATE PUBLIC SPACES

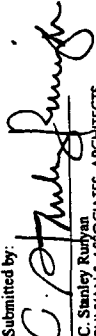
- 3.1 **BLOCK CORNERS:** These open spaces would strongly identify the Mall as a special place in contrast to the typical built-up corners of the city and would function as four gathering areas and entrances from block corners to the Mall.
- 3.2 **COURTYARDS:** By creating a central circulation system with building form at the periphery of blocks, a series of public open spaces would be created to function as defined by the Park Service. These spaces would offer a diversity of uses and views.

5. OBSERVATION TOWER

The creation of a symbolic observation tower should be considered. The tower would offer the following:

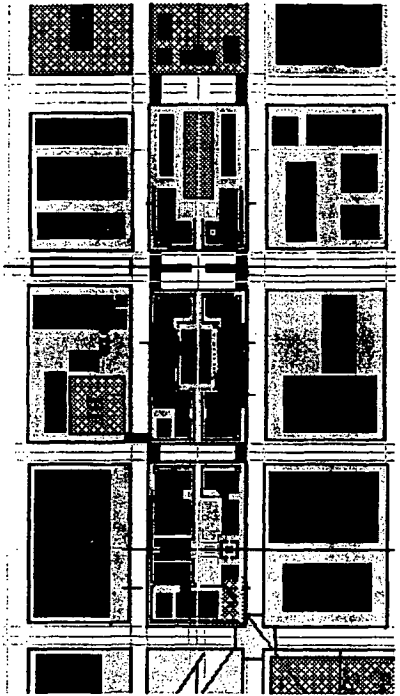
- Day/Night symbol with historic/political significance
- Visual element to draw visitors to northern blocks
- Observation function to give visitors a sense of the historic urban framework of Philadelphia

Submitted by:


C. Stanley Runyan
RUNYAN & ASSOCIATES, ARCHITECTS
Philadelphia

COMMENTS

RESPONSES



URBAN DESIGN PROPOSAL for INDEPENDENCE MALL
INDEPENDENCE National Historical Park
Philadelphia, Pennsylvania
RUMYAN & ASSOCIATES, ARCHITECTS
11 October 1995





As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

